AIR QUALITY MANAGEMENT DISTRICT

STATEMENT OF BASIS FOR 1st RENEWAL OF TITLE V FEDERAL OPERATING PERMIT

Application No.: TV2009-09-01

Date: March 26, 2013

Jorge DeGuzman/

Evaluation By: Bruce Nixon

A. FACILITY INFORMATION:

FACILITY NAME: Aerojet - Sacramento Operations

LOCATION: 2001 Aerojet Road

Rancho Cordova, CA 95742

MAILING ADDRESS: P.O. Box 13222 #MS 5596

Sacramento, CA 95813-6000

PARENT COMPANY: Aerojet - General Corporation

RESPONSIBLE OFFICIAL: Robert Werling

Vice President, Sacramento Operations

Phone: (916) 355-3611

CONTACT PERSON: Chelsea Westerberg

Environmental Specialist Phone: (916) 804-2361

B. PURPOSE OF THIS STATEMENT OF BASIS:

The Title V Federal Operating Permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose of this Statement of Basis is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This Statement of Basis will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this Statement of Basis, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

C. TITLE V PERMIT HISTORY

This Statement of Basis is for the first renewal of Aerojet's current Title V Federal Operating Permit No. TV1996-09-02.

The current permit was to expire on March 01, 2009 but has been extended because the SMAQMD did not act on the permit renewal application by that date [see SMAQMD Rule 207 Section 303.2]. Aerojet submitted a timely and complete Title V application for permit renewal on February 29, 2008.

The following permit actions have occurred since the initial Title V Federal Operating Permit No. TV1996-09-01 was issued:

Permit Action	Date Issued	Permit No.
Initial Title V Federal Operating Permit	03-01-2004	TV1996-09-01
1st Minor Modification	07-23-2007	TV1996-09-02

This 1st renewal of the Title V permit will be assigned the permit number TV2009-09-01.

D. FACILITY DESCRIPTION

Aerojet's primary activities include manufacturing Propulsion Systems and Parts (SIC Code 3764) and Ordnance- Armaments (SIC Code 3489):

1. Propulsion Systems and Parts:

Aerojet manufactures liquid (e.g. Delta, Titan, NK-33) and solid (e.g. AMRAAM, Hawk, Standard Missile, Minuteman) propulsion systems and aerospace components (e.g. F-22 boom) in support of government and commercial contracts. The components can be fabricated, assembled, tested and/or refurbished by Aerojet.

2. Ordnance- Armaments:

Aerojet manufactures ordnance items in support of government and commercial contracts. The ordnance can be fabricated, assembled, tested and/or refurbished by Aerojet.

The activities listed above are supported by boilers, internal combustion engines, rocket motor test stands, paint booths, abrasive blasting processes, baghouses, scrubbers, gasoline dispensing equipment and general maintenance equipment. Research and development and testing are also performed at this facility.

Below is a description of SMAQMD Rule 201 permit actions that have taken place since the last modification to the Title V permit through the date 09-01-2011.

PERMIT CANCELLATIONS: The following equipment with the specified P/O No. has been removed or is no longer in use and will not be included in the Title V permit renewal. Equipment that was modified will be included in the Title V permit renewal but with a different referenced SMAQMD Rule 201 P/O No.

	Cancelled SMAQMD Rule 201 Permits to Operate			
P/O No.	Date Cancelled	Equipment Description	Reason for Cancellation	
2016	01-16-2007	Test Stand	No longer in use.	
2041	05-17-2007	Test Stand	Permit Modified by P/O No. 20083	
3255	02-27-2008	Boiler	Permit Modified by P/O No. 20443	
3256	10-29-2008	Boiler	Permit Modified by P/O No. 21000	
5739	10-01-2010	APC Baghouse	No longer in use.	
5996	05-04-2007	APC Baghouse	Permit Modified by P/O No. 19351	
6440	03-31-2007	Boiler	Permit Modified by P/O No. 19730	
6893	04-15-2010	Paint Spray Booth	No longer in use.	
6981	04-16-2010	Paint Spray Booth	No longer in use.	
7413	03-01-2011	APC Baghouse	No longer in use.	
8263	06-30-2008	Test Stand	Permit Modified by P/O No. 21132	
8457	04-21-2010	APC Baghouse	No longer in use.	
9964	06-30-2008	Abrasive Blasting Booth	Permit Modified by P/O No. 20917	
10303	01-16-2008	Boiler	Permit Modified by P/O No. 20438	
10304	09-30-2008	Boiler	Permit Modified by P/O No. 20869	
10305	09-30-2008	Boiler	Permit Modified by P/O No. 20872	
10306	03-31-2007	Boiler	Permit Modified by P/O No. 19735	
10307	02-27-2008	Boiler	Permit Modified by P/O No. 20440	
10308	10-29-2008	Boiler	Permit Modified by P/O No. 21081	
10309	09-30-2008	Boiler	Permit Modified by P/O No. 20870	
10310	02-27-2008	Boiler	Permit Modified by P/O No. 20441	
10314	12-12-2006	Boiler	Permit Modified by P/O No. 19748	

	Cancelled SMAQMD Rule 201 Permits to Operate			
P/O No.	Date Cancelled	Equipment Description	Reason for Cancellation	
10315	04-30-2007	Boiler	No longer in use.	
10317	12-12-2006	Boiler	Permit Modified by P/O No. 19749	
10319	11-30-2008	Boiler	Permit Modified by P/O No. 20873	
10321	10-29-2008	Boiler	Permit Modified by P/O No. 21080	
10322	03-31-2007	Boiler	Permit Modified by P/O No. 19733	
10326	03-31-2007	Boiler	Permit Modified by P/O No. 19741	
10327	03-31-2007	Boiler	Permit Modified by P/O No. 19742	
10330	03-31-2007	Boiler	Permit Modified by P/O No. 19743	
10331	03-31-2007	Boiler	Permit Modified by P/O No. 19740	
10332	03-05-2008	Boiler	Permit Modified by P/O No. 20439	
10333	12-12-2006	Boiler	Permit Modified by P/O No. 19737	
10334	03-31-2007	Boiler	Permit Modified by P/O No. 19738	
10337	12-20-2006	Boiler	Permit Modified by P/O No. 19729	
10339	04-30-2008	Boiler	Permit Modified by P/O No. 20600	
10341	03-31-2007	Boiler	Permit Modified by P/O No. 19739	
10342	03-31-2007	Boiler	Permit Modified by P/O No. 19750	
10353	11-30-2008	Boiler	Permit Modified by P/O No. 21083	
10355	02-03-2009	Boiler	The boiler is de-rated to < 1 MMBTU/hr	
10356	03-31-2007	Boiler	Permit Modified by P/O No. 19747	
10358	01-24-2008	Boiler	Permit Modified by P/O No. 19731	
10361	03-05-2008	Boiler	Permit Modified by P/O No. 19746	
10378	02-06-2009	APC Baghouse	No longer in use.	
10421	03-31-2010	IC Engine Standby	No longer in use.	
10779	07-16-2008	IC Engine Standby	Equipment has been removed.	
12357	03-31-2007	Boiler	Permit Modified by P/O No. 19744	
12358	03-31-2007	Boiler	Permit Modified by P/O No. 19745	
12363	01-29-2009	Boiler	Permit Modified by P/O No. 21146	
12364	04-18-2008	Boiler	Permit Modified by P/O No. 20442	

	Cancelled SMAQMD Rule 201 Permits to Operate			
P/O No.	Date Cancelled	Equipment Description	Reason for Cancellation	
12366	01-29-2009	Boiler	Permit Modified by P/O No. 21145	
12367	05-21-2009	Boiler	Permit Modified by P/O No. 21605	
12368	04-07-2011	Boiler	No longer in use.	
12376	04-30-2007	Boiler	Permit Modified by P/O No. 19751	
12377	04-10-2008	Boiler	Permit Modified by P/O No. 20601	
12378	04-30-2008	Boiler	Permit Modified by P/O No. 20602	
12933	01-24-2008	Boiler	Permit Modified by P/O No. 19732	
12935	04-10-2008	Boiler	Permit Modified by P/O No. 20599	
13556	10-29-2008	Boiler	Permit Modified by P/O No. 21084	
13558	03-31-2007	Boiler	Permit Modified by P/O No. 19752	
13560	01-29-2009	Boiler	Permit Modified by P/O No. 21141	
13561	01-29-2009	Boiler	Permit Modified by P/O No. 21142	
13562	01-29-2009	Boiler	Permit Modified by P/O No. 21143	
13563	03-31-2011	Autoclave	No longer in use.	
14512	08-20-2007	Dust Collector	Permit Modified by P/O No. 20418	
15126	08-17-2009	PM Handling System	Permit Modified by P/O No. 21653	
15335	11-03-2009	IC Engine Standby	Permit Modified by P/O No. 21136	
15436	09-30-2008	Boiler	Permit Modified by P/O No. 21203	
16049	11-30-2008	Boiler	Permit Modified by P/O No. 21082	
17638	02-28-2007	Rocket Test Stand	Permit Modified by P/O No. 18769	
17830	10-09-2008	Aerospace Misc. Coating	Permit Modified by P/O No. 21140	
18053	01-29-2009	Boiler	Permit Modified by P/O No. 21144	
18118	11-30-2008	Liquid Waste Vol Reduction	No longer in use.	
18650	05-17-2010	Abrasive Blasting	Permit Modified by P/O No. 22040	
18651	02-27-2008	Abrasive Blasting	Permit Modified by P/O No. 20485	
18769	04-22-2008	Rocket Test Stand	Permit Modified by P/O No. 20703	
18793	05-04-2007	Miscellaneous	Permit Modified by P/O No. 20030	
18840	04-22-2008	Aerospace Misc. Coating	Permit Modified by P/O No. 20652	

	Cancelled SMAQMD Rule 201 Permits to Operate			
P/O No.	Date Cancelled	Equipment Description	Reason for Cancellation	
19351	09-20-2010	APC Baghouse	Permit Modified by P/O No. 22170	
19730	05-31-2007	Boiler/Heater	No longer in use.	
19736	04-30-2007	Boiler/Heater	P/O No.10308 (the permit replaced by this one) has been re-instated.	
19738	10-04-2010	Boiler/Heater	No longer in use.	
19739	10-04-2010	Boiler/Heater	No longer in use.	
19740	10-04-2010	Boiler/Heater	No longer in use.	
19741	10-04-2010	Boiler/Heater	No longer in use.	
19742	10-04-2010	Boiler/Heater	No longer in use.	
19743	10-04-2010	Boiler/Heater	No longer in use.	
19744	03-31-2010	Boiler/Heater	No longer in use.	
19745	03-31-2010	Boiler/Heater	No longer in use.	
19746	02-05-2008	Boiler/Heater	Permit Modified by P/O No. 20313	
20030	02-27-2008	Chem Manuf Process	Permit Modified by P/O No. 20492	
20083	06-30-2008	Rocket Test Stand	Permit Modified by P/O No. 21015	
20418	06-18-2010	APC Baghouse	Permit Modified by P/O No. 22225	
20485	05-17-2010	Abrasive Blasting	Permit Modified by P/O No. 22029	
20599	01-29-2009	Boiler	Permit Modified by P/O No. 21147	
21153	08-31-2010	APC Baghouse	Permit Modified by P/O No. 22438	

NEW PERMITS: The following SMAQMD Rule 201Permits to Operate have been issued since the last Title V modification through the date 09-01-2011. These new Permits to Operate will be incorporated into the Title V permit renewal.

	New SMAQMD Rule 201 Permits to Operate		
P/O No.	Date Issued	Description	
19729	12-19-2006	1.26 MMBTU/hr Boiler - Modification of P/O No. 10337 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.	
19731	01-22-2008	2.1 MMBTU/hr Boiler - Modification of P/O No. 10358 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.	
19732	01-22-2008	2.52 MMBTU/hr Boiler - Modification of P/O No. 12933 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.	
19733	03-29-2007	2.94 MMBTU/hr Boiler - Modification of P/O No. 10322 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.	
19735	03-29-2007	1.6 MMBTU/hr Boiler - Modification of P/O No. 10306 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.	
19737	12-11-2006	3.36 MMBTU/hr Boiler - Modification of P/O No. 10333 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.	
19738	03-29-2007	2.8 MMBTU/hr Boiler - Modification of P/O No. 10334 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.	
19739	03-29-2007	2.52 MMBTU/hr Boiler - Modification of P/O No. 10341 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.	
19740	03-29-2007	2.1 MMBTU/hr Boiler - Modification of P/O No. 10331 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.	
19741	03-29-2007	2.1 MMBTU/hr Boiler - Modification of P/O No. 10326 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.	
19742	03-29-2007	2.1 MMBTU/hr Boiler - Modification of P/O No. 10327 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.	

	New SMAQMD Rule 201 Permits to Operate		
P/O No.	Date Issued	Description	
19743	03-29-2007	2.1 MMBTU/hr Boiler - Modification of P/O No. 10330 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.	
19744	03-29-2007	20.9 MMBTU/hr Boiler - Modification of P/O No. 12357 to comply with SMAQMD Rule 411 by taking a fuel restriction of 200,000 therms per year.	
19745	03-29-2007	20.9 MMBTU/hr Boiler - Modification of P/O No. 12358 to comply with SMAQMD Rule 411 by taking a fuel restriction of 2000,000 therms per year.	
19747	03-29-2007	2.1 MMBTU/hr Boiler - Modification of P/O No. 10356 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.	
19748	12-11-2006	1.26 MMBTU/hr Boiler - Modification of P/O No. 10314 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.	
19749	12-11-2006	1.26 MMBTU/hr Boiler - Modification of P/O No. 10317 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.	
19750	03-29-2007	1.47 MMBTU/hr Boiler - Modification of P/O No. 10342 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.	
19751	04-02-2007	5.25 MMBTU/hr Boiler - Modification of P/O No. 12376 to comply with SMAQMD Rule 411 by taking a fuel restriction of 200,000 therms per year.	
19752	03-29-2007	1.3 MMBTU/hr Boiler - Modification of P/O No. 13558 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.	
20313	03-04-2008	1.7 MMBTU/hr Boiler - Replacing P/O No. 19746 to comply with SMAQMD Rule 411.	
20384	01-22-2008	3.45 MMBTU/hr Boiler	
20418	08-10-2007	APC Baghouse - Modification of P/O No. 14512	
20419	12-14-2007	Depaint Process	

		New SMAQMD Rule 201 Permits to Operate
P/O No.	Date Issued	Description
20438	01-11-2008	4.2 MMBTU/hr Boiler - Modification of P/O No. 10303 to comply with SMAQMD Rule 411 by replacing the burner.
20439	03-04-2008	2.5 MMBTU/hr Boiler - Modification of P/O No. 10332 to comply with SMAQMD Rule 411 by replacing the burner.
20440	02-22-2008	1.7 MMBTU/hr Boiler - Modification of P/O No. 10307 to comply with SMAQMD Rule 411 by replacing the burner.
20441	02-26-2008	2.1 MMBTU/hr Boiler - Modification of P/O No. 10310 to comply with SMAQMD Rule 411 by replacing the burner.
20442	04-16-2008	6.3 MMBTU/hr Boiler - Modification of P/O No. 12364 to comply with SMAQMD Rule 411 by replacing the burner.
20443	02-22-2008	4.2 MMBTU/hr Boiler - Modification of P/O No. 3255 to comply with SMAQMD Rule 411 by replacing the burner.
20485	02-22-2008	Abrasive Blasting - Modification of P/O No. 18651
20492	02-22-2008	Chemical Process - Modification of P/O No. 20030
20600	04-10-2008	4.2 MMBTU/hr Boiler - Modification of P/O No. 10339 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.
20601	04-10-2008	5.25 MMBTU/hr Boiler - Replacing P/O No. 12377 to comply with SMAQMD Rule 411 by taking a fuel restriction of 200,000 therms per year.
20602	04-10-2008	5.28 MMBTU/hr Boiler - Replacing P/O No. 12378 to comply with SMAQMD Rule 411 by taking a fuel restriction of 200,000 therms per year.
20652	04-21-2008	Aerospace Misc. Coating - Modification of P/O No. 18840
20703	04-21-2008	Rocket Test Stand - Modification of P/O No. 18769

	New SMAQMD Rule 201 Permits to Operate		
P/O No.	Date Issued	Description	
20869	09-23-2008	4.2 MMBTU/hr Boiler - Modification of P/O No. 10304 to comply with SMAQMD Rule 411 by taking an enforceable emission limit compliant with SMAQMD Rule 411.	
20870	09-23-2008	2.1 MMBTU/hr Boiler - Modification of P/O No. 10309 to comply with SMAQMD Rule 411 by taking an enforceable emission limit compliant with SMAQMD Rule 411.	
20872	09-23-2008	2.5 MMBTU/hr Boiler - Modification of P/O No. 10305 to comply with SMAQMD Rule 411 by taking an enforceable emission limit compliant with SMAQMD Rule 411.	
20873	11-25-2008	4.2 MMBTU/hr Boiler - Modification of P/O No. 10319 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.	
20917	06-13-2008	Abrasive Blasting Booth - Modification of P/O No. 9964	
21000	10-30-2008	3.36 MMBTU/hr Boiler - Modification of P/O No. 3256 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.	
21015	06-13-2008	Rocket Test Stand - Modification of P/O No. 20083	
21080	10-30-2008	2.94 MMBTU/hr Boiler - Modification of P/O No. 10321 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.	
21081	10-30-2008	1.68 MMBTU/hr Boiler - Modification of P/O No. 10308 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.	
21082	11-25-2008	2.1 MMBTU/hr Boiler - Modification of P/O No. 16049 to comply with SMAQMD Rule 411 by replacing the burner.	
21083	11-25-2008	2.9 MMBTU/hr Boiler - Modification of P/O No. 10353 to comply with SMAQMD Rule 411 by replacing the burner.	

		New SMAQMD Rule 201 Permits to Operate	
P/O No.	Date Issued	Description	
21084	10-30-2008	2.5 MMBTU/hr Boiler - Modification of P/O No. 13556 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.	
21132	06-17-2008	Rocket Test Stand - Modification of P/O No. 8263	
21136	11-02-2009	568 hp IC Engine Standby, Portable - Modification to P/O No. 15335	
21140	10-17-2008	Aerospace Miscellaneous Coating - Modification of P/O No. 17830	
21141	01-29-2009	4.85 MMBTU/hr Boiler - Modification of P/O No. 13560 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.	
21142	01-29-2009	4.8 MMBTU/hr Boiler - Modification of P/O No. 13561 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.	
21143	01-29-2009	4.3 MMBTU/hr Boiler - Modification of P/O No. 13562 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.	
21144	01-29-2009	4.3 MMBTU/hr Boiler - Modification of P/O No. 18053 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.	
21145	01-29-2009	4.9 MMBTU/hr Boiler - Modification of P/O No. 12366 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.	
21146	01-29-2009	4.5 MMBTU/hr Boiler - Modification of P/O No. 12363 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.	
21147	01-29-2009	4.2 MMBTU/hr Boiler - Modification of P/O No. 20599 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.	
21153	08-01-2008	APC Baghouse	
21203	09-23-2008	4.9 MMBTU/hr Boiler - Modification of P/O No. 15436 to comply with SMAQMD Rule 411 by taking an enforceable emission limit compliant with SMAQMD Rule 411.	

		New SMAQMD Rule 201 Permits to Operate	
P/O No.	Date Issued	Description	
21605	05-21-2009	8.4 MMBTU/hr Boiler - Modification of P/O No. 12367 to comply with SMAQMD Rule 411 by replacing burner with Low-NOx burner	
21619	01-28-2009	IC Engine, emergency use, 619 hp	
21653	08-06-2009	APC Baghouse - Modification of APC baghouse P/O No. 15126 to allow for venting of asbestos-containing exhaust air from machining rocket nozzles	
21734	05-14-2010	Mandrel manufacturing process	
21766	11-02-2009	APC Baghouse, 1520 ft2, 10 hp fan, 5,000 cfm capacity.	
21973	05-14-2010	APC Baghouse, 264 ft2, 7.5 hp fan, 2000cfm capacity	
22018	06-28-2011	Paint spray booth	
22029	05-14-2010	Abrasive Blasting Modification of P/O No. 20485	
22040	05-14-2010	Abrasive Blasting Modification of P/O No. 18650	
22170	05-14-2010	APC Baghouse Modification of P/O No. 19351	
22225	06-15-2010	APC Baghouse Modification of P/O No. 20418	
22438	08-09-2010	APC Baghouse Modification of P/O No. 21153	

F. INSIGNIFICANT EMISSIONS UNIT INFORMATION

Section B of the permittee's Title V permit application contains a list of insignificant emission units operated at the facility. The table below summarizes the list contained in Section B of the permittee's Title V permit application.

These emission units are considered insignificant emission sources and are listed in the Title V permit as such.

Equipment Category as Listed in the SMAQMD Title V List and Criteria "List of Insignificant Activities", adopted 04-26-2001	Basis for Exemption	Equipment (for details of equipment see Section B of the permittee's Title V permit application)
I. General Criteria for Insignificant Activities	1. Not subject to a source-specific requirement of a State Implementation Plan and Emits no more than 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than two tons per year of a regulated pollutant that is not a HAP	 a. Unregulated Tanks A number of etching tanks, cleaning tanks, rinse tanks, storage tanks, dip tanks, etc. b. Various emission units that emit less than 2 lb/day. c. HVAC equipment. d. General Repairs and Maintenance. This includes operations such as the weld shop, plant-wide janitorial services and general maintenance.
II.A Fugitive Emission Sources Associated with Insignificant Activities	Fugitive emissions sources associated with insignificant activities	
II.B Combustion and Heat Transfer Equipment	 Combustion equipment with maximum heat input < 1,000,000 BTU/hour (A) and exclusively fired with natural gas or LPG (propane) Piston-type internal combustion engine with rating ≤ 50 bhp 	a. Space Heatersb. Boilersc. IC Engines

Equipment Category as Listed in the SMAQMD Title V List and Criteria "List of Insignificant Activities", adopted 04-26-2001	Basis for Exemption	Equipment (for details of equipment see Section B of the permittee's Title V permit application)
II.C Cooling Towers	1. Any water cooling tower which: 1) has a circulation rate of less than 10,000 gallons per minute; and 2) is not used to cool process water, water from barometric jets, or water from barometric condensers	NA
II.D Printing and Reproduction Equipment	 Any printing, coating, or laminating activity which uses no more than two gallons per day of graphic arts materials, including: inks, coatings, adhesives, fountain solutions, thinners, retarders, or cleaning solutions. Any laser printing equipment. 	Office printers, fax and copiers
II.E Food Processing Equipment	NA	NA
II.F Plastic and / or Rubber Processing Equipment	NA	NA
II.G Storage Containers, Reservoirs, and Tanks - Fuel, Fuel Oil and Asphalt	1. Any equipment used exclusively for the storage of fuel oils or non-air-blown asphalt with specific gravity 0.9042 or higher (25° API or lower) as determined by API test method 2547 or ASTM test method D-1298-80.	a. Fuel storage tanks for diesel and JP10.

Equipment Category as Listed in the SMAQMD Title V List and Criteria "List of Insignificant Activities", adopted 04-26-2001	Basis for Exemption	Equipment (for details of equipment see Section B of the permittee's Title V permit application)
II.H Storage Containers, Reservoirs, and Tanks - General Organic and VOC-Containing Material	 Any equipment used exclusively for the storage of unheated organic material with: An initial boiling point of 150° C [302° F] or greater as determined by ASTM test method 1078-86); or A vapor pressure of no more than five millimeters mercury (mmHg) [0.1 pound per square inch (psi) absolute] as determined by ASTM test method D-2879-86. Any equipment with a capacity of no more than 250 gallons used exclusively for the storage of unheated organic liquid. Any equipment with a capacity of no more than 6,077 gallons used exclusively for the underground storage of unheated organic liquid with a vapor pressure no more than 75 mm Hg (1.5 psi absolute) as determined by ASTM test method D-2879-86. 	 a. Tanks containing liquids with Vp ≤ 77.5 mm Hg and < 6076 Gal Capacity These tanks contain mainly motor oil, kerosene, Kodak Rp developer solution, butyl acetate, xylene, IPA and hydraulic oil. b. Unheated, non-conveyorized solvent rinsing containers and dip tanks.
II.I Storage Containers, Reservoirs, and Tanks - Inorganic Material	NA	NA

Basis for Exemption	Equipment (for details of equipment see Section B of the permittee's Title V permit application)	
Any equipment used exclusively for the storage of liquefied gases in unvented (except for emergency pressure-relief valves) pressure vessels.	a. Tanks containing liquefied or compressed gases. These tanks contain mainly LPG, liquid nitrogen, liquid argon, liquid and gaseous H2, liquid and gaseous O2 and helium.	
NA	NA	
NA	NA	
NA	NA	
1. Any equipment or activity using no more than one gallon per day of surface coating, or any combination of surface coating and solvent, which contains either VOC or hazardous air pollutants (HAP), or both.	Various equipment meeting the described criteria.	
 Any equipment or activity using no more than one gallon per day of solvent, or combination of solvent and surface coating, which contains either VOC or HAP, or both. Any unheated, non-conveyorized cleaning equipment (not including control enclosures): a. which has an open surface area of no more than 10.8 square 	Various equipment meeting the described criteria.	
	1. Any equipment used exclusively for the storage of liquefied gases in unvented (except for emergency pressure-relief valves) pressure vessels. NA NA NA 1. Any equipment or activity using no more than one gallon per day of surface coating, or any combination of surface coating and solvent, which contains either VOC or hazardous air pollutants (HAP), or both. 1. Any equipment or activity using no more than one gallon per day of solvent, or combination of solvent and surface coating, which contains either VOC or HAP, or both. 2. Any unheated, nonconveyorized cleaning equipment (not including control enclosures): a. which has an open	

Equipment Category as Listed in the SMAQMD Title V List and Criteria "List of Insignificant Activities", adopted 04-26-2001	Basis for Exemption	Equipment (for details of equipment see Section B of the permittee's Title V permit application)
	and internal volume of no more than 92.5 gallons b. which uses organic solvents with an initial boiling point of 302° F or greater as determined by ASTM test method 1078-78 c. from which the owner or operator can demonstrate, through solvent purchase and use records, that less than 25 gallons per year of solvent was lost exclusive of solvent loss from recycling or disposal. 3. Any solvent wipe cleaning provided such cleaning: a. utilizes a container applicator to limit emissions (e.g., squeeze containers with narrow tips, spray bottles, dispensers with press-down caps, etc.) b. occurs at a facility which emits no more than five tons VOC (uncontrolled emissions) per calendar year from all solvent wipe-cleaning operations or which purchases no more than 1,500 gallons of solvent per calendar	

Equipment Category as Listed in the SMAQMD Title V List and Criteria "List of Insignificant Activities", adopted 04-26-2001	Basis for Exemption	Equipment (for details of equipment see Section B of the permittee's Title V permit application)
	year.	
II.P Abrasive Blasting	Any blast cleaning equipment using a suspension of abrasive material in water and the control equipment venting such blast cleaning equipment.	Various equipment meeting the described criteria.
	2. Any abrasive blast room when vented to a control device that discharges back to the room.	
II.Q Brazing, Soldering, Welding and Cutting Torches	1. Any brazing, soldering, welding, or cutting torch equipment used in manufacturing and construction activities and with the potential to emit hazardous air pollutant (HAP) metals, provided the total emissions of HAPs do not exceed 0.5 tons per year.	Various equipment meeting the described criteria.
II.R Solder Leveler, Hydrosqueegee, Wave Solder Machine, or Drag Solder Machine	NA	NA
II.S Metal Products	NA	NA
II.T Aerosol Can Puncturing or Crushing	NA	NA
II.U Biotechnology Manufacturing	NA	NA
II.V Textile Dyeing, Stripping or Bleaching	NA	NA

Equipment Category as Listed in the SMAQMD Title V List and Criteria "List of Insignificant Activities", adopted 04-26-2001	Basis for Exemption	Equipment (for details of equipment see Section B of the permittee's Title V permit application)	
II.W Laboratory Fume Hoods and Vents	Any laboratory fume hood or vent, provided such equipment is used exclusively for the purpose of teaching, research, or quality control.	a. Laboratory equipment. These units include general lab operations, hoods and process areas.	
II.X Refrigeration Units	Any refrigeration unit provided the unit: a. Contains less than 50 pounds of refrigerant; and b. Is not used in conjunction with air pollution control equipment.	a. Refrigeration units	
NA	CERCLA sources that are covered by a U.S. EPA consent decree under CERCLA and thus not subject to SMAQMD Rule 201permit requirements and therefore not included in the Title V permit.	a. CERCLA Activities The permittee operates a number of air stripping towers.	

⁽A) The Rule 201 exemption level of less than 1 MMBtu/hr was used instead of the ≤ 5 MMBtu/hr List and Criteria level listed in the above referenced document in order not to confuse the permit exemption level, as listed in category II.B above.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

This section describes the emission units that have a current and valid SMAQMD Rule 201 Permit to Operate from the SMAQMD and are part of the Title V Federal Operating Permit.

The column heading "PO No." refers to the assigned SMAQMD Rule 201 Permit to Operate number.

1. IC Engine, Emergency Use/Electrical Generator, ≤ 500 hp, Diesel Fuel

РО		Manufacturer/	Location/	Maximum Hours of Operation		
No.	(hp)	Model No./ Serial No./	Building	Maintenance	Emergency + Maintenance	
10294	50	Cummins 6A3-4-G1 53132157	J-Area	20 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr	
10423	299	Caterpillar 3208 5YF00294	30015	20 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr	
10426	134	GM Detroit 10437305 4A0214108	20022	20 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr	
14748	335	Generac 99A06418-5 2051487	20001	30 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr	
18758	153	John Deere 40445H PE4045H513942	00003	50 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr	

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

2. IC Engine, Emergency Use/Electrical Generator, > 500 hp, Diesel Fuel

РО	- 3	Manufacturer/	Location/	Maximum Hours of Operation		
No.	(hp) Model No./ Serial No./ Building		Building	Maintenance	Emergency + Maintenance	
10422	830	Detroit 6A13506 DD12VF002353	Portable	20 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr	
21136	568	Detroit Diesel 8V-92A 8VF1777262 Retrofitted with Clean Cam Technology System (CARB executive order G-096-029- 024-A) - Portable	Portable	30 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr	
21619	619	Caterpillar C15 FSE01980	Portable	50 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr	

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

3. IC Engine, Emergency Use/Fire Pump, Diesel Fuel

РО	Rating	Manufacturer/	Location/	Maximum H	Maximum Hours of Operation		
No.	(hp)	p) Model No./ Building Serial No./		Maintenance	Emergency + Maintenance		
10408	182	Cummins 6-BTA5.9 44675473	37013	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr		
10434	115	GM Detroit 4061A 4A-29520	00017	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr		
10435	115	GM Detroit 4061A 4A-29519	00017	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr		
10436	115	GM Detroit 4061A 4A-29518	00017	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr		
10437	250	GM Detroit unknown 313596	00017	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr		
10438	115	GM Detroit 4061A 4A-29521	00017	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr		
10439	152	Cummins NT-495-FP 25147741	20007	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr		

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

3. IC Engine, Emergency Use/Fire Pump, Diesel Fuel (continued)

РО	Rating	Manufacturer/	Location/	Maximum Ho	ours of Operation
No.	(hp)	Model No./ Serial No./	Building	Maintenance	Emergency + Maintenance
10440	152	Cummins NT-495-FP 25149920	20010	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10441	115	GM Detroit 4061A APD B51852	15011	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10442	115	GM Detroit 4061A APD B51851	15011	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10443	340	Cummins NT-855-F3 11422248	46046	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10444	340	Cummins NT-855-F3 11422553	46046	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10445	170	Cummins NY-495-FP 25155927	32010	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10446	340	Cummins NT-855-F3 11422554	32010	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

4. IC Engine, Emergency Use/Electrical Generator, Propane Fuel

P/O	Rating Manufacturer/		Location/	Maximum Hours of Operation		
No.	(hp)	Model No./ Serial No./	Building	Maintenance	Emergency	
10424	84	Generac SG5034150 821288/AGC209099	20015 portable	100 hr/yr	Unlimited during emergencies	

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

5. Boiler, Small (Heat Input < 5 MMBTU/hr)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
12918	3.03	Kewanee L3S-70-G 867701	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20004	Steam generation for use as process/comfort heat.
14603	4.25	Hearst 5622 S500-160-1	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20019A	Steam generation for use as process/comfort heat.
19729	1.26	ABCO 30C 8706	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	00006	Steam generation for use as process/comfort heat.
19731	2.1	Cleaver Brooks M4W-2000 G-13445-M4	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	Various Locations (portable backup)	This boiler is used on a standby basis as a replacement unit for a boiler which is permanently connected to a fuel source and taken out of service for maintenance purposes or because of a breakdown.
19732	2.52	ABCO 60C 8714	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	Various Locations (portable backup)	This boiler is used on a standby basis as a replacement unit for a boiler which is permanently connected to a fuel source and taken out of service for maintenance purposes or because of a breakdown.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
19733	2.94	Ray Husky WR3-70 B7936	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01023	Steam generation for use as process/comfort heat.
19735	1.6	Ray Husky WR3-40 B5581	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01034	Steam generation for use as process/comfort heat.
19737	3.36	Ray Husky NB9056 N/A	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01062	Steam generation for use as process/comfort heat.
19747	2.1	ABCO 50C 8897	Propane	8 hr/day 5 day/wk 50 wk/yr	46038	Steam generation for use as process/comfort heat.
19748	1.26	Kewanee 2775 K3595	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	49011	Steam generation for use as process/comfort heat.
19749	1.26	Kewanee 2775 K7122	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	49011	Steam generation for use as process/comfort heat.
19750	1.47	ABCO 40C 8867	Propane	8 hr/day 5 day/wk 50 wk/yr	04056	Steam generation for use as process/comfort heat.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
19752	1.3	ABCO 30C 8713	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20004	Steam generation for use as process/comfort heat.
20313	1.7	Ray Husky WR3-40 B5542	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	00007	Steam generation for use as process/comfort heat.
20384	3.45	Husky WR 3-90 B5309	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	05080	Steam generation for use as process/comfort heat.
20438	4.2	Cleaver Brooks CBH 101-100 L44455	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01023	Steam generation for use as process/comfort heat.
20439	2.5	Superior NB9053 N/A	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01028	Steam generation for use as process/comfort heat.
20440	1.7	Ray Husky WR3-40 15499	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01050	Steam generation for use as process/comfort heat.
20441	2.1	Ray Husky WR3-50 15546	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01058	Steam generation for use as process/comfort heat.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
20443	4.2	Cleaver Brooks CB 189-100 L41586	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20015B	Steam generation for use as process/comfort heat.
20600	4.2	Husky WR3-100 B5495-4052	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01062	Steam generation for use as process/comfort heat.
20869	4.2	Cleaver Brooks CBH 101-100 L44454	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01023	Steam generation for use as process/comfort heat.
20870	2.1	Ray Husky WR3-50 15545	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01058	Steam generation for use as process/comfort heat.
20872	2.5	Ray Husky WR3-60 15244	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01028	Steam generation for use as process/comfort heat.
20873	4.2	Ray Husky WR3-100 B50765	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01066	Steam generation for use as process/comfort heat.
21000	3.36	Cleaver Brooks CBX189X-80 L29651	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20025A	Steam generation for use as process/comfort heat.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
21080	2.94	Husky WR3-70 B7936	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01034	Steam generation for use as process/comfort heat.
21081	1.68	Johnston Co. 213-BCP S3262	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01056	Steam generation for use as process/comfort heat.
21082	2.1	Kewanee FB 194W-A522-X 648490	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20002	Steam generation for use as process/comfort heat.
21083	2.9	Kewanee M 235 65581	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20001	Steam generation for use as process/comfort heat.
21084	2.5	Superior 4-5-304 8667	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20019	Steam generation for use as process/comfort heat.
21141	4.85	ABCO 150AFDG-150 8963	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20002	Steam generation for use as process/comfort heat.
21142	4.8	ABCO 150AFDG-150 8965	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20002	Steam generation for use as process/comfort heat.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
21143	4.3	ABCO 150AFDG-150 8964	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20004	Steam generation for use as process/comfort heat.
21144	4.3	Superior MS5625 8812	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	5080	Steam generation for use as process/comfort heat.
21145	4.9	Ray Husky WR3-150 B5173-3548	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01086	Steam generation for use as process/comfort heat.
21146	4.5	Ray Husky WR3-125 B-5308	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01096	Steam generation for use as process/comfort heat.
21147	4.2	Hurst S625-150-16 N/A	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	Various Locations (portable backup)	Steam generation for use as process/comfort heat.
21203	4.9	Hurst FM-200-D-12 S1000-15-11	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20004	Steam generation for use as process/comfort heat.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

6. Boiler, Large (Heat Input ≥ 5 MMBTU/hr)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
12369	6.3	York Shipley SPHC59-125-3 60-6191	Propane	8 hr/day 5 day/wk 50 wk/yr	04045	Steam generation for use as process/comfort heat.
12370	5.25	Cleaver Brooks CB100-125 L76910	Propane	8 hr/day 5 day/wk 50 wk/yr	04090	Steam generation for use as process/comfort heat.
14064	5.0	Hurst 5712 S625-15-24	Synthetic Diesel	8 hr/day 5 day/wk 50 wk/yr	38008	Steam generation for use as process support heat.
14611	15.6	Cleaver Brooks D-26-RH WG3378	Synthetic Diesel	8 hr/day 5 day/wk 50 wk/yr	38008	Steam generation for use as process support heat.
19751	5.25	ABCO 125RD 8712	Propane	8 hr/day 5 day/wk 50 wk/yr	36015	Steam generation for use as process/comfort heat.
20442	6.3	Husky/Ray WR3-150 B5173	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01086	Steam generation for use as process/comfort heat.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
20601	5.25	Cleaver Brooks CB100-125 L78698	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	Various Locations (portable backup)	This boiler is used on a standby basis as a replacement unit for a boiler which is permanently connected to a fuel source and taken out of service for maintenance purposes or because of a breakdown.
20602	5.28	ABCO 125A 8889	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	Various Locations (portable backup)	This boiler is used on a standby basis as a replacement unit for a boiler which is permanently connected to a fuel source and taken out of service for maintenance purposes or because of a breakdown.
21605	8.4	Husky/Ray WR3-200 B7948	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01023	Steam generation for use as process/comfort heat.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

7. Space Heater

P/O No.	Equipment Descrip	otion	Building	Operating Schedule
12127	Make: Model: Fuel: Number of Units: Rating:	Lambert/Raznor Various Models Natural Gas 36 at 0.1 MMBTU/hr each 3.6 MMBTU/hr (combined total)	20022	8 hr/day 5 day/wk 50 wk/yr
13660	Make: Model: Fuel: Number of Units: Rating:	Various Makes Various Models Natural Gas 24 at various MMBTU/hr each 3.015 MMBTU/hr (combined total)	20015	8 hr/day 5 day/wk 50 wk/yr

8. Rocket Testing - Liquid Fuels

PO No.	Equipment Description	Location/ Building
8534	Rocket Engine Test Stands, E Zone, and associated oxidizer flare stack venting the liquid hydrogen run tanks	Zone E
12164	Rocket Engine Test Stand, E-5	Zone E, Test Stand E-5

9. Rocket Testing - Solid Fuels

PO No.	Equipment Description	Location/ Building
66	Horizontal Test Stand, W-4, for static firing of solid rocket motors.	46100
68	Horizontal Test Stand, J-1A, for simulated altitude firing of solid rocket motors.	J-Zone 38000
71	Horizontal Test Stand, T4, for static firing of igniters and solid rocket motors.	46035
18853	Horizontal Test Stand, T3, for static firing of igniters and solid rocket motors.	46035
18859	Horizontal Test Stand, T2, for static firing of igniters and solid rocket motors.	46035
20703	Horizontal Test Stand, P3, for static firing of solid rocket motors.	46030

10. Rocket Testing - Liquid and Solid Fuels

PO No.	Equipment Description	Location/ Building
21015	Test Stand, J Zone, for static firing of liquid and solid rocket motors.	Zone J Area 38
8633	Oxidizer flare venting system. After testing small scale liquid fuel engines/components, oxidizers containing fluorides and fuels (except the hydrazines) are vented to the flare and oxidized.	Bldg 38090
8641	Fuel flare stack venting the run tank and supply lines from the tank safety valve to the thrust chamber assembly valve.	
9284	APC scrubbing system venting hydrazines and nitrogen tetroxide emissions from rocket component testing and propellant transfer, consisting of:	
	 One (1) fuel scrubber: 10 ft long x 6 in diameter, water spray, gas labyrinth type using water solution as scrubbing liquor. One (1) oxidizer scrubber: 10 ft long x 6 in diameter, water spray, gas labyrinth type using water 	
	solution as scrubbing liquor. 3. Associated piping, scrubbing liquor storage tanks.	
21132	Rocket Engine Test Stands, A Zone, for static firing of liquid and solid rocket motors.	Zone A Bldg 30101/
9328	APC scrubbing system venting hydrazines and nitrogen tetroxide emissions rocket component testing and propellant transfer, consisting of:	30102
	1. One (1) fuel scrubber: 12 ft long x 18 in diameter, water spray, gas labyrinth type using water solution as scrubbing liquor.	
	2. One (1) oxidizer scrubber: 10 ft long x 6 in diameter, water spray, gas labyrinth type using water solution as scrubbing liquor.	
	3. Associated piping, scrubbing liquor storage tanks.	

11. Abrasive Blasting Unit

PO No.	Equipment Description	Location/ Building
6385	Abrasive Blasting Unit: Semi-automatic abrasive blaster, Progressive Blasting Systems, Serial #6304, 176 hp	20005
6386	Baghouse: Progressive Blasting Systems, Model C, Serial # 6304, 10 hp blower and 600 sq ft of filter cloth area.	
8532	Abrasive Blasting Unit: Pauli & Griffin, model PRAM 31, Serial #109, rated at 2 hp. Equipped with a Pauli & Griffin baghouse, model SCWB-2452, with a 2 hp blower.	20004
8732	Abrasive Blasting Unit: Clemco, booth model Flo-Flor (20 ft x 12 ft x 8 ft), blaster model SC 2452, rated at 2.25 hp.	20120
8733	Baghouse: Clemco, model 2880, 20.75 hp blower, 2880 sq ft of filter cloth area.	
9963	Abrasive Blasting Unit: Pauli & Griffin, model PRAM 31, serial #218, rated at 2 hp.	20004
	Baghouse: Pauli & Griffin, 2 hp blower, 450 sq ft of filter cloth area (cartridge type).	
20917	Abrasive Blasting Unit: Pauli & Griffin, model PRAM 31, Serial #212	01012
	Baghouse: Pauli & Griffin, 2 hp blower, 450 sq ft of filter cloth area (cartridge type).	

12. Dry Material Grinding System

PO No.	Equipment Description	Location/ Building
157	Air Pollution Control System: A. Rotoclone No. 1, American Air Filter, Wet Dynamic Type, Model W, 20 hp B. Exhaust System Venting Microatomizer and 2 DH Micropulverizer Processes	01103
158	Air Pollution Control System: A. Rotoclone No. 2, American Air Filter, Wet Dynamic Type, Model W, 20 hp B. Exhaust System Venting Raymond Mill and 2 DH Micropulverizer Processes	01103
1401	Oxidizer Grinding System: A. Microatomizer process B. 2 DH Micropulverizer process C. Grinder Bypass Process The grinding system is used to grind various types of oxidizers. The system is vented through integral baghouses and Rotoclone No. 1 (PO 157).	01103
1402	Auxiliary Air Pollution Control System for Raymond Mill: A. Cyclone B. Baghouse, 140 sq ft filter cloth area C. Venting inside grind room no. 2	01103
7104	Oxidizer Grinding System: A. Feeder hopper B. Grinding mill C. 100 hp air compressor D. 75 hp air compressor The RDX/HMX grinding system is used to grind various types of oxidizers. The system is operated remotely. The process is vented through collection system (PO No.17904)	01024

12. Dry Material Grinding System (continued)

PO No.	Equipment Description	Location/ Building
7608	Oxidizer Grinding System: A. Raymond Mill Process B. 2 DH Micropulverizer Process C. Grinder Bypass Process The grinding system is used to grind various types of oxidizers. The system is vented through integral baghouses and Rotoclone No. 2 (PO 158).	01103
17904	APC System for RDX/HMX Grinding: The collection system consists of four baghouses: A. Primary Baghouse 1: Mikro-Pulsaire, Model: 255-B-30C, 400 cfm and 235 ft² cloth area. B. Primary Baghouse 2: Mikro-Pulsaire, Model: 122-DC-3, 400 cfm and 42 ft² cloth area C. Secondary Baghouse 1: Unknown manufacturer, 400 cfm and 8.1 ft² cloth area D. Secondary Baghouse 2: Aerojet, 400 cfm & 8.5 ft² cloth area	01024

13. Rocket Motor Dissection Process

PO No.	Equipment Description		Location/ Building
22029	Abrasive Blasting Equipment Make: Clemco Model: 3661 Capacity: 10 ft3 Chamber rotation stand, 1hp Abrasive: Black Beauty, Grade Fine, co	Compressor: Make: Ingersol Rand Model: P-100-W-W Serial No.: 114701-U80-901 Driven by: 33 hp gasoline IC engine Engine Make: White Engine Inc. Engine Serial No.: G1600X118	46004 W-5
22040	Abrasive Blasting Equipment Make: Clemco Model: SCFW-2452 Capacity: 6 ft3 Chamber rotation stand, 1hp Abrasive: Black Beauty, Grade Fine, ce	Compressor: Make: Ingersol Rand Rating: 75 hp, electric, 110 psig ertified under applicable CARB Executive Order	46011

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

14. Particulate Collection System - Dry

PO No.	Make	Model	Filter Area sq ft	Blower hp	Flow cfm	Serving	Location/ Building
277	Pangborn Corp	223CK-1	1000	7.8	3000	Carpenter shop (wood shavings and sawdust)	20022
22888	Sternvent Co	CCP-100-10- 2000	2000	20	5000	Monarch Missile Master Lathe and the American Pacemaker Lathe	20004
7455	American Air Filter (4)	105-1003052-17	N/A	6	2750	Submix/Premix Area	01112
7456	American Air Filter	105-1003052-17	N/A	2	700	Submix/Premix Area	00112
8588	Nilfisk	GS-83	15.4	1.5	208	Production contingencies, short term projects and asbestos cleanups	20004 and various locations
15125	Ross Cook	3HZV6-HE2-XP	564	40	1830	Machining processes	20004
22170	Sternvent Co	CC-3610-720D	720	20	5300	Machine operations in plastics lab	20004
21973	Arrestall	AR-45	264	7.5	2000	Machining processes	05077
22225	Torit	124-7.5	400	15	2900	Machining and Woodworking Processes	20004
22438	Donaldson Torit	DFO-2-4	760	7.5	1300	Rocket motor machining operations in the composite shop.	20004
21653	Ross Cook	2HZV16-HE32	1536	100	5000	NC room machining process	20004

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

14. Particulate Collection System - Dry (continued)

PO No.	Make	Model	Filter Area sq ft	Blower hp	Flow cfm	Serving	Location/ Building
21766	Donaldson Torit	DFO-2-8	1520	10	5000	Turning, milling and drilling processes using a Hermle 5 Axismilling machine and an Okuma Howe Vertical Turret Lathe	20004

15. Particulate Collection System - Wet Scrubber

PO No.	Equipment Description	Serving	Location/ Building
165	Make: Schmieg Model: STM-100 Type: Water Scrubber Size: 4'5" W x 4'5" L x 10' H, with a 15 hp pump Blower: 3400 CFM	Unit used to remotely machine propellant samples for testing (Slitter/Saw).	05030

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

16. Aerospace Coating Operation (Subject to Aerospace NESHAP GG)

PO No.	Make	Serial No./ Model No.	Dimensions	Exhaust Fan hp	Spray Gun Type	Location/ Building
150	Devilbliss	22050	12'W x 10'H x 7'6"D	5 hp	HVLP	01085
8444	Viking	1212	12'W x 12'H x 8'D	7.5 hp	HVLP	20004
17204	Binks	PF-A-12-10T	12'W x 10'-6"H x 11'-2"D	5 hp	HVLP	01048
17205	Binks	PFA-12-10T	12'W x 10'-6"H x 11'-2"D	5 hp	HVLP	01085
22018	None	None	None	None	Hand application	20004

17. Aerospace Cleaning and Surface Preparation Operation (Subject to Aerospace NESHAP GG)

PO No.	Description	Location/ Building
17489	Miscellaneous facility-wide solvent cleaning and surface preparation of aerospace vehicles and components	Facility-Wide

18. Aerospace Cleaning and Surface Preparation Operation (Not Subject to Aerospace NESHAP GG)

PO No.	Description	Location/ Building
20419	Solvent cleaning and surface preparation for Space Vehicles	20004

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

19. Aerospace Coating Operation (Not Subject to Aerospace NESHAP GG)

PO No.	Make	Application	Serial No./ Model No.	Dimensions	Exhaust Fan	Spray Gun Type	Location/ Building
					hp		
153	Devilbliss	Space Vehicle Coating	XSW 6520	12'W x 8'H x 4'2"D	15 hp	HVLP	01083
5811	Aerojet Design	Specialty coating	T-114389	12'W x 10'H x 12'D	0.25 hp	HVLP and Air Atomizing Reciprocating Spray Boom (equivalent method that is approved under SMAQMD Rule 456 Section 303.9 by SMAQMD and U.S. EPA)	20004
7497	Binks	Specialty coating - rubber sealant spray booth	N/A	16'W x 12'H x 26'D	(2) 5-hp blowers	HVLP	20004

19. Aerospace Coating Operation (Not Subject to Aerospace NESHAP GG) (continued):

PO No.	Make	Application	Serial No./ Model No.	Dimensions	Exhaust Fan	Spray Gun Type	Location/ Building
					hp		
8217	Binks	Specialty coating	FF-12-8-T	12'W x 8'H x 7'6"D	7.5 hp	HVLP and Air Atomizing Reciprocating Spray Boom (equivalent method that is approved under SMAQMD Rule 456 Section 303.9 by SMAQMD and U.S. EPA)	01012
20652	Box- Bleeker	Space vehicle coating or specialty coatings as defined in App. A of 40 CFR Part 63		24'W x 8'H x 10'D	7.5 hp	HVLP	01098
21140	Pratt & Whitney	Space vehicle coating or specialty coatings as defined in App. A of 40 CFR Part 63		2'W x 6'H x 32'L	0.75 hp	Air Atomizing Reciprocating Spray Boom (equivalent method that is approved under SMAQMD Rule 456 Section 303.9 by SMAQMD and U.S. EPA)	01083

G. SIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

20. Coating Operation - Metal and Wood

PO No.	Make	Application	Serial No./ Model No.	Dimensions	Exhaust Fan (hp)	Spray Gun Type	Location/ Building
7801	Viking	Metal and wood	Model SB-24	14'-0"W x 9'-0"H x 24'L	3 hp	HVLP	20022

21. RDX Drying Facility

PO No.	Description	Location/ Building
7779	RDX drying facility No. 1, 8' x 8' floor area	01024
7780	Condenser venting RDX drying room No. 1, 3-ton refrigeration unit, (2) blowers, 500 cfm each, 0.33 hp each	01024

22. Degreaser, Non-vapor

PO No.	Description	Location/ Building
6968	Degreaser, non-vapor type, Aerojet manufacture, 30" W x 18" D x 48" L, with water cover and two 0.75-hp exhaust fans	01126
7075	Degreaser, non-vapor type, Aerojet manufacture, 30" W x 18" D x 48" L, with water cover and two 0.75-hp exhaust fans	01126

23. Bowl Cleaning Station

PO No.	Description	Location/ Building
154	Bowl cleaning station No. 1 with a 16' W x 13' L elevated platform for propellant mixing bowls 6' 3" dia x 7' h	01036
155	Bowl cleaning station No. 2 with a 16' W x 13' L elevated platform for propellant mixing bowls 6' 3" dia x 7' h	01036

24. Gasoline Storage and Dispensing Facility

P/O No.	Description	Location/ Building
17375	Gasoline storage and dispensing facility	West of Bldg 20022

25. Pilot Plant Chemical Manufacturing Process

PO No.	Description	Location/ Building
20492	Pilot plant chemical manufacturing process	01020

26. Soluble Mandrel Manufacturing Process

P/O No.	Description	Location/ Building
21734	Soluble mandrel manufacturing process	20004

H. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Facility-wide Requirements - General

SMAQMD Rule 101 – General Provision and Definitions

<u>SIP Approved:</u> 09-03-1998 (64 FR 13514)

Rule Description: This rule provides definitions of terms, specifies authority to arrest and

specifies what data is public information.

<u>Compliance Status:</u> The rule does not require the permittee to take any actions.

SMAQMD Rule 102 – Circumvention

<u>SIP Approved:</u> 12-05-1984 (49 FR 47490)

Rule Description: This rule prohibits concealment of emissions and specifies how

compliance determinations are made for combined and separated

emissions.

<u>Compliance Status:</u> The permittee is expected to comply with the rule requirements.

SMAQMD Rule 105 - Emission Statement

<u>SIP Approved:</u> 06-06-2008 (73 FR 32240)

09-05-1996 rule version is SIP approved

Rule Description: This rule requires the facility to provide annual emission data.

Compliance Status: The permittee has provided annual emission data as required and is in

compliance.

SMAQMD Rule 201 - General Permit Requirements

<u>SIP Approved:</u> 07-13-1987 (52 FR 26148)

11-20-1984 rule version is SIP approved

08-24-2006 rule version is the current version and is not SIP approved

Rule Description: This rule provides an orderly procedure for the review of new sources of

air pollution and of the modification and operation of existing sources

through the issuance of permits.

Compliance Status: The permittee has active permits for all sources that require permits.

H. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Facility-wide Requirements - General (continued)

SMAQMD Rule 202 - New Source Review

SIP approved: SIP approval of 11-20-1984 rule version was withdrawn on 08-19-2011.

10-28-2010 rule version is the current version and is not SIP approved.

This rule is not Federally enforceable.

Rule Description: This rule sets the procedures for review of new and modified stationary

sources and provides the mechanisms for evaluating the applicability of

BACT and offset requirements.

Compliance Status: The permittee's past permit actions have been in compliance with this

rule.

SMAQMD Rule 207 - Title V Federal Operating Permits

SIP Approved: 11-21-2003 (68 FR 65637) (as part of the Title V Federal Operating

Permit program approval)

04-26-2001 rule version is SIP approved

Rule Description: This rule sets forth the procedures for review, issuance and renewal of

Title V operating permits.

Compliance Status: The permittee has submitted a timely and complete Title V permit

renewal application. The expiration date of the current Title V Operating Permit is therefore extended to the time that the SMAQMD makes a decision regarding approving the renewal of the Title V Operating

Permit.

SMAQMD Rule 214 - Federal New Source Review

SIP Approved: 07-20-2011 (76 FR 43183)

Rule Description: This rule sets the procedures for review of emissions units at new and

modified major stationary sources and provides the mechanisms for

evaluating the applicability of BACT and/or offset requirements.

Compliance Status: This is a recently adopted and SIP approved rule. The facility's

equipment will be reviewed pursuant to this rule, if applicable, for all

future permitting actions.

SMAQMD Rule 301 - Permit Fees (for Title V referenced fees only)

SIP approved: The rule is not SIP approved but the portions of the rule that reference

Title V permit fees are applicable because they are part of the SMAQMD Title V Federal Operating Permit program approved by U.S.

EPA on 11-21-2003 (68 FR 65637).

Rule Description: This rule requires Title V sources to pay specified fees.

Compliance Status: The permittee has paid permit fees as required and is in compliance.

SMAQMD Rule 307 - Clean Air Act Fees

SIP approved: 08-26-2003 (68 FR 51184)

Rule Description: This rule requires major sources of VOC and NOx to pay specified fees

beginning after the U.S. EPA determines that the SMAQMD has failed to demonstrate attainment of the one hour ozone ambient air quality

standard by the attainment year.

Compliance Status: The owner/operator is expected to comply with the fee requirement.

SMAQMD Rule 401 - Ringelmann Chart

<u>SIP Approved:</u> 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: All of the permittee's equipment is expected to comply with the visible

emission requirement.

SMAQMD Rule 403 - Fugitive Dust

<u>SIP Approved:</u> 12-05-1984 (49 FR 47490)

08-03-1977 rule version is SIP approved

Rule Description: The rule regulates equipment and processes that may cause fugitive

dust emissions into the atmosphere.

Compliance Status: The facility complies with this rule by taking the necessary precautions

to ensure that fugitive dust is not airborne beyond the property line.

H. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Facility-wide Requirements - General (continued)

SMAQMD Rule 442 - Architectural Coatings

SIP Approved: 11-09-1998 (63 FR 60214)

09-05-1996 rule version is SIP approved

05-24-2001 rule version is the current version and is not SIP approved

Rule Description: This rule limits the quantity of volatile organic compounds in

architectural coatings supplied, sold, offered for sale, applied, solicited

for application or manufactured for use within the District.

Compliance Status: The affected coatings used by the permittee are received and stored in

containers that display the required manufacturer's labels and

demonstrate compliance with the rule's requirements.

SMAQMD Rule 466 - Solvent Cleaning

<u>SIP approved:</u> 05-05-2010 (75 FR 24406)

10-28-2010 rule version is SIP approved

Rule Description: This rule reduces the emissions of volatile organic compounds from

solvent cleaning operations and activities, and from the storage and

disposal of new and spent cleaning solvents.

Compliance Status: The affected architectural coating application equipment solvent

cleaning materials used by the facility are received and stored in containers that display the required manufacturer's labels and

demonstrate compliance with the rule's requirements.

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 701 - Emergency Episode Plan

SIP approved: 09-05-2000 (65 FR 53602):

Rule Description: This rule requires a plan be prepared for specific actions to be taken

when health related levels of ozone, carbon monoxide or PM10 are exceeded and is applicable to sources exceeding 50 tons of VOC or

NOx or 100 tons of CO or PM.

Compliance Status: This rule is not applicable because the actual emissions from the facility

are less than the applicability levels listed in the rule.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 64 (begin at 64.1) Compliance Assurance Monitoring

<u>Promulgated:</u> 10-22-1997 (52 FR 54940)

Rule Description:

The Compliance Assurance Monitoring (CAM) regulation applies to pollutant-specific emissions units at a major source if the unit satisfies all of the following criteria:

1. 40 CFR 64.2(a)(1)

The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;

2. 40 CFR 64.2(a)(2)

The unit uses a control device to achieve compliance with any such emission limitation or standard; and

3. 40 CFR 64.2(a)(3)

The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount to be classified as a major source. For purposes of this paragraph, "potential precontrol device emissions' shall have the same meaning as "potential to emit," as defined in 40 CFR 64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.

Compliance Status:

 Other than the rocket motor test stands, none of the emission units operated by the permittee have an uncontrolled potential to emit greater than 100 percent of the amount to be classified as a major source -

ROC 25 tpy NOx 25 tpy SO2 100 tpy PM2.5 100 tpy PM10 100 tpy CO 100 tpy

These emission units are therefore not subject to the CAM

requirements.

2. The rocket motor test stands do not use a control device to achieve compliance with an emission limitation or standard. They are therefore not subject to the CAM requirements.

40 CFR 68 (begin at 68.1) - Chemical Accident Prevention Provisions

<u>Promulgated:</u> 01-31-1994 (59 FR 4493)

[04-09-2004 most recent amendment]

Rule Description: This regulation specifies requirements for owners or operators of

stationary sources concerning the prevention of accidental chemical

releases.

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, must comply with the requirements of 40 CFR

Part 68.

40 CFR 68.215 requires that the air permitting authority include in the Title V permit for a facility specified statements regarding the regulation. Those statements are included in the Federally Enforceable

Requirements - General section of the permit.

<u>Compliance Status:</u> The permittee stores more than the designated amounts of the specified

chemical substances in 40 CFR 68 and is in compliance with the

requirements of the regulation.

<u>40 CFR 82 Subpart F (begin at 82.150) - Protection of Stratospheric Ozone - Recycling and Emissions Reduction</u>

Promulgated: 05-14-1993 (58 FR 28712)

[08-11-2011 most recent amendment]

Rule Description: The purpose of this subpart is to reduce emissions of class I and class II

refrigerants and their substitutes to the lowest achievable level by maximizing the recapture and recycling of such refrigerants during the service, maintenance, repair and disposal of appliances and restricting the sale of refrigerants consisting in whole or in part of a class I and

class II ODS in accordance with Title VI of the Clean Air Act.

This subpart applies to any person servicing, maintaining or repairing appliances. This subpart also applies to persons disposing of appliances, including small appliances and motor vehicle air

conditioners. In addition, this subpart applies to refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale and persons purchasing class I or class II refrigerants.

As indicated in 40 CFR 70.6, Title V permits need to assure compliance with all applicable requirements at the time of permit issuance. Part 70 defines as an applicable requirement, "Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the Act, unless the Administrator has determined that such requirements need not be contained in a Title V permit." [40 CFR 70.2(12)]. The applicable requirements of Title VI are included in the Federally Enforceable Requirements - General section of the permit.

Compliance Status:

The permittee employs qualified contractors to maintain equipment that contains class I or class II refrigerants.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements

Section 1 - IC Engine, Emergency Use/Generator Set, ≤ 500 hp, Diesel Fuel

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)

12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion

contaminants by limiting emission concentrations of SO2 and particulate

matter (PM).

Compliance Status: The following tables illustrate (1) the SMAQMD Rule 406 emission limits

for sulfur compounds (measured as SO2) and combustion contaminants (measured as PM) and (2) the expected emissions from the equipment

at the facility.

The permittee's equipment complies with this rule.

SO2 Emission Concentration

Equipment	SMAQMD Rule 406 Allowable Sulfur Compounds Emissions	Expected Sulfur Compounds Emissions from Subject Equipment
	ppmv as SO2	ppmv as SO2
IC engine, emergency use	2000	1.03 (A)

(A) Calculated value based on the following:

Diesel Fuel F-Factor = 9190 dscf/mmBTU
Molar Volume = 385.3 ft3/mol
Diesel HHV = 19,300 BTU/lb

SO2 Emission Factor = 0.005 g/hp-hr (CARB diesel fuel with 15 ppmw S content)

BSFC = 7000 BTU/hp-hr

The following calculation of SO2 concentration is at 0% excess air which represents worst case.

- = (0.005 g/hp-hr) x (1 lb SO2/453.6 g) x (1 hp-hr/7000 BTU) x (1E6 BTU/MMBTU) x (1 MMBTU/9190 dscf) x (1 mol SO2/64 lb SO2) x (385.3 dscf/mol exhaust)
- = 0.000001032 mol SO₂/mol exhaust
- = 1.03 ppmv

Particulate Matter Emission Concentration

Equipment	SMAQMD Rule 406 Allowable Combustion Contaminants (PM) Emissions	Expected Combustion Contaminants (PM) Emissions from Subject Equipment
	grains/dscf at 12% CO2	grains/dscf at 12% CO2
IC engine, emergency use	0.1	0.028 (A)

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements

Section 1 - IC Engine, Emergency Use/Generator Set, ≤ 500 hp, Diesel Fuel (continued)

(A) Calculated value based on the following:

 Diesel Fuel F-Factor
 = 9190 dscf/mmBTU

 Molar Volume
 = 385.3 ft3/mol

 Diesel HHV
 = 19,300 BTU/lb

 Conversion Factor
 = 15.432 gr/g

 PM10 Emission Factor
 = 0.15 g/hp-hr

 BSFC
 = 7000 BTU/hp-hr

 Weight % C in Diesel
 = 87% or 0.87 lb C/lb fuel

- 1. Calculate uncorrected grain loading
 - = $(0.15 \text{ g/hp-hr}) \times (15.432 \text{ gr/g}) \times (1 \text{ hp-hr}/7000 \text{ BTU}) \times (1E6 \text{ BTU/MMBTU}) \times (1 \text{ MMBTU/9190 dscf})$
 - = 0.036 gr/dscf
- 2. Calculate CO2 emission factor (lb CO2/MMBTU) assuming 100% C to CO2 conversion
 - = (0.87 lb C/lb fuel) x (1 mol C/12 lb C) x (1 mol CO2/1 mol C) x (44 lb CO2/mol CO2) x (1 lb fuel/19300 BTU) x (1E6 BTU/MMBTU)
 - = 165.28 lb CO2/MMBTU
- 3. Calculate lb CO2/MMBTU at 99% Conversion of C to CO2
 - = 165.28 lb CO2/MMBTU x 99%
 - = 163.63 lb CO2/MMBTU
- 4. Calculate volume % of CO2 in Exhaust Gas
 - = mol CO2/mol exhaust
 - = (163.63 lb CO2/MMBTU) x (mol CO2/44 lb CO2) x (MMBTU/9190 dscf) x (385.3 dscf/mol exhaust)
 - = 0.156 mol CO2/mol exhaust or 15.6% CO2
- 5. Calculate corrected grain loading
 - = (0.036 gr/dscf) x (12% CO2/15.6% CO2)
 - = 0.028 gr/dscf corrected to 12% CO2

SMAQMD Rule 412 - Stationary IC Engines Located at Major Stationary Sources of NOx

SIP Approved: 04-30-1996 (61 FR 18959)

06-01-1995 rule version is SIP approved

Rule Description: This rule regulates NOx, CO and ROC emissions from the operation of

stationary IC engines located at major stationary sources of NOx. However, emergency use IC engines are only required to install a non-resetting totalizing hour meter (or computerized tracking) and maintain

operation records.

<u>Compliance Status:</u> The permittee's equipment complies with this rule.

(See discussion of streamlining of multiple applicable requirements at

the end of this section.)

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 1 - IC Engine, Emergency Use/Generator Set, ≤ 500 hp, Diesel Fuel (continued)

SMAQMD Rule 420 - Sulfur Content of Fuels

<u>SIP Approved:</u> 12-05-1984 (49 FR 47490)

08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from the combustion

of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for

gaseous and liquid fuels and the expected sulfur content of the gaseous

and liquid fuels combusted in equipment at the facility.

The permittee's equipment complies with this rule.

(See discussion of streamlining of multiple applicable requirements at

the end of this section.)

Equipment	Fuel	SMAQMD Rule 420 Allowable Sulfur Content of Fuel	Expected Sulfur Content of Fuel Used
		% S by weight	% S by weight
IC engine, emergency use	CARB diesel	0.5	0.0015

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permit to

Operate for the IC engine limits emission concentrations, limits mass emissions, requires emission offsets be provided and requires

recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

permits that are not applicable federally enforceable requirements.

PO No.		Permit conditions that are <u>not</u> federally enforceable
	10426 14748	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit

conditions.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements

Section 1 - IC Engine, Emergency Use/Generator Set, ≤ 500 hp, Diesel Fuel (continued)

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

<u>40 CFR 60 Subpart IIII (begin at 60.4200) – Standards of Performance for Stationary</u> Compression Ignition Internal Combustion Engines:

<u>Promulgated:</u> 07-11-2006 (69 FR 33473)

Rule Description: This federal regulation limits the emissions from new Reciprocating

Internal Combustion Engines (RICE.)

Compliance Status: The IC engines are not subject to this rule because they commenced

construction before the applicability date of April 1, 2006.

40 CFR 63 Subpart ZZZZ (begin at 63.6580) - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE):

<u>Promulgated:</u> 06-15-2004 (69 FR 33473)

Rule Description: This federal regulation limits the emission of HAP from stationary

Reciprocating Internal Combustion Engines (RICE) located at major and

area sources of HAP.

Compliance Status: The subpart ZZZZ requirements are applicable to various categories of

IC engines. The permittee's IC engines were installed before June 12, 2006 and therefore are "existing" IC engines as defined in Subpart ZZZZ. The IC engines are all categorized as existing IC engines, emergency use, compression ignition, located at a major source of HAP

and less than 500 hp.

Subpart ZZZZ requirements -

Category: IC engine, emergency use, existing, compression ignition,

≤ 500 hp, located at a major HAP source

[40 CFR 63.6602 and Table 2c]

[40 CFR 63.6625]

1. This source must be in compliance by May 3, 2013.

- 2. This source is required to perform the following maintenance:
 - a. Change their oil and filter every 500 hours of operation or annually, whichever comes first;
 - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first; and

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 1 - IC Engine, Emergency Use/Generator Set, ≤ 500 hp, Diesel Fuel (continued)

- c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- 3. They have an option of utilizing an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. The oil analysis program must analyze the parameters and keep records as required in 40 CFR 63.6625(i).
- 4. During periods of startup, they must minimize the IC engine idle at startup time not to exceed 30 minutes.
- 5. The IC engine must be operated and maintained according to the manufacturer's instructions or in accordance with a maintenance plan developed by the source which provides for maintenance and operation consistent with good air pollution control practices.
- 6. Emergency use IC engines must install a non-resettable hour meter
- 7. This source must keep records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment.
- 8. Records of actions taken during periods of malfunction to minimize emissions must be kept including corrective action taken.
- 9. They must keep records of maintenance conducted.
- 10. If the emergency use IC engine doesn't meet the same emission standards as those applicable to non-emergency engines, the source must keep records of the hours spent for emergency operation, what classified the operation as emergency, and how many hours are spent for non-emergency operation.
- 11. All records must be in a form suitable to and readily available for expeditious review and kept for five years

The Subpart ZZZZ requirements are future effective requirements with a compliance date of May 3, 2013. This will be noted in the Title V Federal Operating Permit conditions.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
 Equipment Specific Requirements
 Section 1 - IC Engine, Emergency Use/Generator Set, ≤ 500 hp, Diesel Fuel (continued)

Streamlining Multiple Applicable Requirements:

A. Sulfur Content of Fuel

Basis of Requirement	Applicable Requirements % S by weight
SMAQMD Rule No. 420 – Sulfur Content of Fuels	≤ 0.5%
SMAQMD Rule No. 201 permit conditions based on: SMAQMD Rule No. 202 – New Source Review	≤ 0.0015%

Pursuant to U.S. EPA's *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, the above applicable requirements will be streamlined. The most stringent requirements are the permit conditions based on SMAQMD Rule Nos. 201 and 202, which will be included in the Title V permit.

B. Hour Meter

Basis of Requirement	Applicable Requirements
SMAQMD Rule No. 412 – Stationary IC Engines Located at Major Stationary Sources of NOx	Operate a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.
SMAQMD Rule No. 201 permit conditions based on: SMAQMD Rule No. 202 – New Source Review	Operate a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.

Pursuant to U.S. EPA's *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, the above applicable requirements will be streamlined. The permit conditions based on SMAQMD Rule Nos. 201 and 202 are as stringent as the SMAQMD Rule 412 requirements and will be included in the Title V permit.

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I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 2 - IC Engine, Emergency Use/Generator Set, > 500 hp, Diesel Fuel

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)

12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion

contaminants by limiting emission concentrations of SO2 and particulate

matter (PM).

Compliance Status: See the tables in Section I.1 that illustrate (1) the SMAQMD Rule 406

emission limits for sulfur compounds (measured as SO2) and combustion contaminants (measured as PM) and (2) the expected

emissions from the equipment at the facility.

The permittee's equipment complies with this rule.

SMAQMD Rule 412 - Stationary IC Engines Located at Major Stationary Sources of NOx

SIP Approved: 04-30-1996 (61 FR 18959)

06-01-1995 rule version is SIP approved

Rule Description: This rule regulates NOx, CO and ROC emissions from the operation of

stationary IC engines located at major stationary sources of NOx. However, emergency use IC engines are only required to install a non-resetting totalizing hour meter (or computerized tracking) and maintain

operation records.

<u>Compliance Status:</u> The permittee's equipment complies with this rule.

(See discussion of streamlining of multiple applicable requirements at

the end of this section.)

SMAQMD Rule 420 - Sulfur Content of Fuels

<u>SIP Approved:</u> 12-05-1984 (49 FR 47490)

08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from the combustion

of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for

gaseous and liquid fuels and the expected sulfur content of the gaseous

and liquid fuels combusted in equipment at the facility.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 2 - IC Engine, Emergency Use/Generator Set, > 500 hp, Diesel Fuel (continued)

The permittee's equipment complies with this rule.

(See discussion of streamlining of multiple applicable requirements at the end of this section.)

Equipment	Fuel	SMAQMD Rule 420 Allowable Sulfur Content of Fuel % S by weight	Expected Sulfur Content of Fuel Used % S by weight
IC engine, emergency use	CARB diesel	0.5	0.0015

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description:

The conditions of operation on the SMAQMD Rule 201 Permit to Operate for the IC engine limits emission concentrations, limits mass emissions, requires emission offsets be provided and requires recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permits that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are <u>not</u> federally enforceable
10422 21136 21619	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.

<u>Compliance Status:</u> The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

<u>40 CFR 60 Subpart IIII (begin at 60.4200) – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines:</u>

<u>Promulgated:</u> 07-11-2006 (69 FR 33473)

Rule Description: This federal regulation limits the emissions from new Reciprocating

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements

Section 2 - IC Engine, Emergency Use/Generator Set, > 500 hp, Diesel Fuel (continued)

Internal Combustion Engines (RICE.)

Compliance Status: The IC engines are not subject to this rule because they commenced

construction before the applicability date of April 1, 2006.

The following federal regulation is not applicable to this equipment but it is discussed here to document the non-applicability determination for the record:

<u>40 CFR 63 Subpart ZZZZ (begin at 63.6580) - National Emission Standards for Hazardous</u> Air Pollutants for Reciprocating Internal Combustion Engines (RICE):

Promulgated: 06-15-2004 (69 FR 33473)

Rule Description: This federal regulation limits the emission of HAP from stationary

Reciprocating Internal Combustion Engines (RICE) located at major and

area sources of HAP.

Compliance Status: 1. PO 21619

The IC engine under PO No. 21619 is portable (i.e. mobile not stationary) and is therefore not subject to Subpart ZZZZ by the definition of a stationary RICE in 40 CFR 63.6675 -

Stationary reciprocating internal combustion engine (RICE) means any reciprocating internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

2. PO 10422 and 21136

The subpart ZZZZ requirements are applicable to various categories of IC engines. These IC engines were installed before December 19, 2002 and therefore are "existing" IC engines as defined in Subpart ZZZZ. They are all categorized as existing IC engines, emergency use, compression ignition, located at a major source of HAP and greater than 500 hp.

Subpart ZZZZ requirements -

Category: IC engine, emergency use, existing, compression ignition, > 500 hp, located at a major HAP source: [40 CFR 63.6600(c)]

1. The IC engines in this category do not have to comply with any

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
 Equipment Specific Requirements
 Section 2 - IC Engine, Emergency Use/Generator Set, > 500 hp, Diesel Fuel (continued)

requirements of Subpart ZZZZ.

Streamlining Multiple Applicable Requirements:

A. Sulfur Content of Fuel

Basis of Requirement	Applicable Requirements % S by weight
SMAQMD Rule No. 420 – Sulfur Content of Fuels	≤ 0.5%
SMAQMD Rule No. 201 permit conditions based on: SMAQMD Rule No. 202 – New Source Review	≤ 0.0015%

Pursuant to U.S. EPA's *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, the above applicable requirements will be streamlined. The most stringent requirements are the permit conditions based on SMAQMD Rule Nos. 201 and 202, which will be included in the Title V permit.

B. Hour Meter

Basis of Requirement	Applicable Requirements
SMAQMD Rule No. 412 – Stationary IC Engines Located at Major Stationary Sources of NOx	Operate a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.
SMAQMD Rule No. 201 permit conditions based on: SMAQMD Rule No. 202 – New Source Review	Operate a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.

Pursuant to U.S. EPA's *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, the above applicable requirements will be streamlined. The permit conditions based on SMAQMD Rule Nos. 201 and 202 are as stringent as the SMAQMD Rule 412 requirements and will be included in the Title V permit.

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Permit No. TV2009-09-01

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 3 - IC Engine, Emergency Use/Fire Pump, Diesel Fuel

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)

12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion

contaminants by limiting emission concentrations of SO2 and particulate

matter (PM).

Compliance Status: See the tables in Section I.1 that illustrate (1) the SMAQMD Rule 406

emission limits for sulfur compounds (measured as SO2) and combustion contaminants (measured as PM) and (2) the expected

emissions from the equipment at the facility.

The permittee's equipment complies with this rule.

SMAQMD Rule 412 - Stationary IC Engines Located at Major Stationary Sources of NOx

SIP Approved: 04-30-1996 (61 FR 18959)

06-01-1995 rule version is SIP approved

Rule Description: This rule regulates NOx, CO and ROC emissions from the operation of

stationary IC engines located at major stationary sources of NOx. However, emergency use IC engines are only required to install a non-resetting totalizing hour meter (or computerized tracking) and maintain

operation records.

<u>Compliance Status:</u> The permittee's equipment complies with this rule.

(See discussion of streamlining of multiple applicable requirements at

the end of this section.)

SMAQMD Rule 420 - Sulfur Content of Fuels

<u>SIP Approved:</u> 12-05-1984 (49 FR 47490)

08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from the combustion

of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for

gaseous and liquid fuels and the expected sulfur content of the gaseous

and liquid fuels combusted in equipment at the facility. The permittee's equipment complies with this rule.

Sacramento Metropolitan Air Quality Management District

APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
 Equipment Specific Requirements
 Section 3 - IC Engine, Emergency Use/Fire Pump, Diesel Fuel (continued)

(See discussion of streamlining of multiple applicable requirements at the end of this section.)

Equipment	Fuel	SMAQMD Rule 420 Allowable Sulfur Content of Fuel	Expected Sulfur Content of Fuel Used
		% S by weight	% S by weight
IC engine, emergency use	CARB diesel	0.5	0.0015

Permit Conditions on SMAQMD Rule 201 Permits to Operate:

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permit to

Operate for the IC engine limits emission concentrations, limits mass emissions, requires emission offsets be provided and requires

recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permits that are not applicable federally enforceable requirements.

PO No.			Permit conditions that are not federally enforceable
10408 10434 10435 10436 10437	10438 10439 10440 10441 10442	10443 10444 10445 10446	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.

<u>Compliance Status:</u> The permittee's equipment complies with the SMAQMD Rule 201 permit

conditions.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

<u>40 CFR 60 Subpart IIII (begin at 60.4200) – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines:</u>

<u>Promulgated:</u> 07-11-2006 (69 FR 33473)

Rule Description: This federal regulation limits the emissions from new Reciprocating

Internal Combustion Engines (RICE.)

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 3 - IC Engine, Emergency Use/Fire Pump, Diesel Fuel (continued)

Compliance Status: The IC engines are not subject to this rule because they commenced

construction before the applicability date of April 1, 2006.

40 CFR 63 Subpart ZZZZ (begin at 63.6580) - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE):

<u>Promulgated:</u> 06-15-2004 (69 FR 33473)

Rule Description: This federal regulation limits the emission of HAP from stationary

Reciprocating Internal Combustion Engines (RICE) located at major and

area sources of HAP.

Compliance Status: The subpart ZZZZ requirements are applicable to various categories of

IC engines. The subject IC engines were installed before June 12, 2006 and therefore are "existing" IC engines as defined in Subpart ZZZZ. The IC engines are all categorized as existing IC engines, emergency use, compression ignition, located at a major source of HAP

and less than 500 hp.

Subpart ZZZZ requirements -

Category: IC engine, emergency use, existing, compression ignition,

≤ 500 hp, located at a major HAP source

[40 CFR 63.6602 and Table 2c]

[40 CFR 63.6625]

- 1. This source must be in compliance by May 3, 2013.
- 2. This source is required to perform the following maintenance:
 - a. Change their oil and filter every 500 hours of operation or annually, whichever comes first;
 - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- 3. They have an option of utilizing an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. The oil analysis program must analyze the parameters and keep records as required in 40 CFR 63.6625(i).
- 4. During periods of startup, they must minimize the IC engine idle at startup time not to exceed 30 minutes.
- 5. The IC engine must be operated and maintained according to the manufacturer's instructions or in accordance with a maintenance

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 3 - IC Engine, Emergency Use/Fire Pump, Diesel Fuel (continued)

plan developed by the source which provides for maintenance and operation consistent with good air pollution control practices.

- 6. Emergency use IC engines must install a non-resettable hour meter.
- 7. This source must keep records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or air pollution control and monitoring equipment).
- 8. Records of actions taken during periods of malfunction to minimize emissions must be kept including corrective action taken.
- 9. They must keep records of maintenance conducted.
- 10. If the emergency use IC engine doesn't meet the same emission standards as those applicable to non-emergency engines, the source must keep records of the hours spent for emergency operation, what classified the operation as emergency, and how many hours are spent for non-emergency operation.
- 11. All records must be in a form suitable to and readily available for expeditious review and kept for five years

The Subpart ZZZZ requirements are future effective requirements with a compliance date of May 3, 2013. This will be noted in the Title V Federal Operating Permit conditions.

Streamlining Multiple Applicable Requirements:

A. Sulfur Content of Fuel

Basis of Requirement	Applicable Requirements % S by weight
SMAQMD Rule No. 420 – Sulfur Content of Fuels	≤ 0.5%
SMAQMD Rule No. 201 permit conditions based on: SMAQMD Rule No. 202 – New Source Review	≤ 0.0015%

Pursuant to U.S. EPA's White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, the above applicable requirements will be streamlined. The most stringent requirements are the permit conditions based on SMAQMD Rule Nos. 201 and 202,

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 3 - IC Engine, Emergency Use/Fire Pump, Diesel Fuel (continued)

which will be included in the Title V permit.

B. Hour Meter

Basis of Requirement	Applicable Requirements
SMAQMD Rule No. 412 – Stationary IC Engines Located at Major Stationary Sources of NOx	Operate a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.
SMAQMD Rule No. 201 permit conditions based on: SMAQMD Rule No. 202 – New Source Review	Operate a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.

Pursuant to U.S. EPA's *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, the above applicable requirements will be streamlined. The permit conditions based on SMAQMD Rule Nos. 201 and 202 are as stringent as the SMAQMD Rule 412 requirements and will be included in the Title V permit.

Permit No. TV2009-09-01

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 4 - IC Engine, Emergency Use/Generator Set, Propane

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)

12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion

contaminants by limiting emission concentrations of SO2 and particulate

matter (PM).

Compliance Status: The permittee's equipment complies with this rule. The fuel has a sulfur

content of less than 254 ppmvd thus SO2 emissions are expected to be well below the 2000 ppmv limit set by this rule. This IC engine is fueled with propane thus PM concentration is expected to be well below the

0.1 grains/dscf at 12% CO2 limit of this rule.

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 412 - Stationary IC Engines Located at Major Stationary Sources of NOx

SIP Approved: 04-30-1996 (61 FR 18959)

06-01-1995 rule version is SIP approved

Rule Description: This rule regulates ROC, NOx and CO emissions from the operation of

stationary IC engines located at major stationary sources of NOx.

<u>Compliance Status:</u> This engine is portable, thus not subject to this rule.

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: 12-05-1984 (49 FR 47490)

08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from the combustion

of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for

gaseous and liquid fuels and the expected sulfur content of the gaseous

and liquid fuels combusted in equipment at the facility.

The permittee's equipment complies with this rule.

(See discussion of streamlining of multiple applicable requirements at

the end of this section.)

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 4 - IC Engine, Emergency Use/Generator Set, Propane (continued)

Equipment	Fuel	SMAQMD Rule 420 Maximum Allowable Sulfur Content of Fuel	Expected Sulfur Content of Fuel Used (A)
		g/m3	g/m3
IC engine, emergency use	Propane	1.14	0.33

- (A) Commercial propane has a maximum sulfur concentration of 239 ppmv as H2S, therefore the maximum sulfur concentration as H2S is:
 - = $[(239 \text{ ppmv})(12.187 \text{ mol/ppmv/m3/}^{\circ}\text{C})(34.08 \text{ g/mol})/(273.15 + 25 {}^{\circ}\text{C})]/1000$
 - = 0.33 grams/m3

Permit Conditions on SMAQMD Rule 201 Permit to Operate:

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permit to

Operate for the IC engine limit emission concentrations, limit mass

emissions and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permits that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable	
10424	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.	

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit

conditions.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

<u>40 CFR 60 Subpart JJJJ (begin at 60.4230) – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines:</u>

<u>Promulgated:</u> 01-18-2008 (73 FR 3591)

Rule Description: This federal regulation limits the emissions from new Reciprocating

Internal Combustion Engines (RICE.)

Compliance Status: The IC engine is not subject to this rule because it commenced

construction before the applicability date of January 1, 2009.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 4 - IC Engine, Emergency Use/Generator Set, Propane (continued)

<u>40 CFR 63 Subpart ZZZZ (begin at 63.6580) - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE):</u>

<u>Promulgated:</u> 06-15-2004 (69 FR 33473)

Rule Description: This federal regulation limits the emission of HAP from stationary

Reciprocating Internal Combustion Engines (RICE) located at major and

area sources of HAP.

Compliance Status: The subpart ZZZZ requirements are applicable to various categories of

IC engines. The IC engine was installed before June 12, 2006 and therefore is an "existing" IC engine as defined in Subpart ZZZZ. The IC engine is categorized as an existing IC engine, emergency use, spark

ignited, located at a major source of HAP and less than 500 hp.

Subpart ZZZZ requirements -

Category: IC engine, emergency use, existing, spark ignited, ≤ 500 hp,

located at a major HAP source [40 CFR 63.6602 and Table 2c]

[40 CFR 63.6625]

1. This source must be in compliance by October 19, 2013.

- 2. This source is required to perform the following maintenance:
 - a. Change their oil and filter every 500 hours of operation or annually, whichever comes first;
 - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- 3. They have an option of utilizing an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. The oil analysis program must analyze the parameters and keep records as required in 40 CFR 63.6625(i).
- 4. During periods of startup, they must minimize the IC engine idle at startup time not to exceed 30 minutes.
- 5. The IC engine must be operated and maintained according to the manufacturer's instructions or in accordance with a maintenance plan developed by the source which provides for maintenance and operation consistent with good air pollution control practices.
- 6. Emergency use IC engines must install a non-resettable hour meter.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 4 - IC Engine, Emergency Use/Generator Set, Propane (continued)

- 7. This source must keep records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or air pollution control and monitoring equipment.
- 8. Records of actions taken during periods of malfunction to minimize emissions must be kept including corrective action taken.
- 9. They must keep records of maintenance conducted.
- 10. If the emergency use IC engine doesn't meet the same emission standards as those applicable to non-emergency engines, the source must keep records of the hours spent for emergency operation, what classified the operation as emergency, and how many hours are spent for non-emergency operation.
- 11. All records must be in a form suitable to and readily available for expeditious review and kept for five years

The Subpart ZZZZ requirements are future effective requirements with a compliance date of October 19, 2013. This will be noted in the Title V Federal Operating Permit conditions.

March 26, 2013 Page 83 of 130

Permit No. TV2009-09-01

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 5 - Boiler, Small (Heat Input < 5 MMBTU/hour)

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)

12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion

contaminants by limiting emission concentrations of SO2 and particulate matter (PM). The rule's emission limits are 0.2% SO2 by volume and

0.1 grains PM/ft3 at 12% CO2.

Compliance Status: In compliance. The boilers are fired on gaseous fuels only and are

expected to emit less than 0.001% SO2 by volume and less than 0.02

grains PM/ft3 at 12% CO2.

SMAQMD Rule 411 - NOx from Boilers, Process Heaters and Steam Generators

SIP Approved: 08-01-2007 (72 FR 41894)

[10-27-2005 amended version]

Rule Description: This rule limits NOx and CO emissions from boilers, steam generator

and process heaters with heat input ratings of 1 MMBTU/hour or greater. It limits the emission concentration of NOx to 30 ppm at 3% O2 and the emission of CO to 400 ppm at 3% O2 for boilers < 5 MMBTU/hr. Existing boilers can take a fuel restriction in lieu of

complying with the emissions limitation.

<u>Compliance Status:</u> The permittee complies with the rule requirements by either meeting the

emission standards or by limiting fuel usage, depending on the boiler.

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: 12-05-1984 (49 FR 47490)

08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from the combustion

of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for

gaseous and liquid fuels and the expected sulfur content of the gaseous

and liquid fuels combusted in equipment at the facility.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 5 - Boiler, Small (Heat Input < 5 MMBTU/hour) (continued)</p>

Equipment	Fuel	SMAQMD Rule 420 Allowable Sulfur Content of Fuel	Expected Sulfur Content of Fuel Used(A)
Boilers	Propane	1.14 g/m3	0.33 g/m3
Boilers	Natural Gas	50 grains H2S/100ft3	<0.5 grains H2S/100ft3

⁽A) Commercial propane has a maximum sulfur concentration of 239 ppmv as H2S, thus the maximum concentration in grams/m3 as H2S is: g/m3 = [(239 ppmv)(12.187)(34.08 g/mol)/(273.15+25 °C)]/1000 = 0.33

40 CFR 63 Subpart DDDDD (begin at 63.7480) - NESHAP for Industrial, Commercial and Institutional Boilers - Major Sources:

Rule Description: This rule limits the amount of HAPs that may be released from all new

(built after 06-04-2010) and existing industrial, commercial and institutional boilers and process heaters that are located at facilities

considered to be major sources of HAP.

Rule Status: The rule was originally promulgated 09-13-2004 but immediately faced legal challenges that delayed the rule. The following is the most recent

action on the rule.

02-21-2011 U.S. EPA finalized the revised rule.

05-18-2011 U.S. EPA published a notice delaying the effective date

of the boiler major source rule (The Boiler MACT) until the completion of the recently announced reconsideration or the completion of litigation on the rule,

whichever is earlier.

12-23-2011 U.S. EPA published the Boiler MACT reconsideration

proposal (40 CFR 63, subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional

Boilers and Process Heaters).

01-09-2012 The U.S. District Court for the DC Circuit vacated the

U.S. EPA's May 18, 2011 notice that delayed the

effective dates of the Boiler MACT rule.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 5 - Boiler, Small (Heat Input < 5 MMBTU/hour) (continued)</p>

02-07-2012

U.S. EPA issued a No Action Assurance Letter to establish that they will exercise their enforcement discretion to not pursue enforcement action for violations of certain notification deadlines in the final Major Source Boiler rule. U.S. EPA intends to issue the final reconsideration rule prior to any of the compliance dates for existing sources.

The permittee only has existing boilers at their facility. This makes the compliance date 3 years after the most recent promulgated rule which would be 02-21-2014.

At this time it is not known whether the reconsideration proposal, published 12-23-2011, will change the compliance dates.

Compliance Status:

The final requirements of the NESHAP reconsideration proposal are unknown. No requirements related to the NESHAP will be placed in the Title V permit at this time.

When the NESHAP reconsideration proposal becomes final the Title V permit will be reopened and the necessary requirements will be added.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 5 - Boiler, Small (Heat Input < 5 MMBTU/hour) (continued)</p>

Permit Conditions on SMAQMD Rule 201 Permits to Operate:

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permits that are not applicable federally enforceable requirements.

PO No.			Permit conditions that are not federally enforceable
12918 14603 19729 19731 19732 19738 19739 19740 19741 19742 19743 19747 19748 19749	19750 19752 20313 20384 20438 20439 20440 20441 20443 20600 20869 20870 20872 20873	21000 21080 21081 21082 21083 21084 21141 21142 21143 21144 21147 21203	Conditions No. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
19733 19735 19737 21145 21146			Conditions No. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable. These boilers were originally permitted to allow natural gas or propane as primary fuels (PO Nos. 10322, 10306, 10333, 10318 and 10302). This condition was accidentally removed when the permits were revised to comply with Rule 411 by installing Low-NOx burners. A condition allowing the use of propane will be added back to these permits.

<u>Compliance Status:</u> The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

Permit No. TV2009-09-01

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 6 - Boiler, Large (Heat Input ≥ 5 MMBTU/hr)

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

<u>Compliance Status:</u> All boilers are in compliance with the visible emission requirement.

SMAQMD Rule 406 - Specific Contaminants

<u>SIP Approved:</u> 12-05-1984 (49 FR 47490)

12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion

contaminants by limiting emission concentrations of SO2 and particulate matter (PM). The rule's emission limits are 0.2% SO2 by volume and

0.1 grains PM/ft3 at 12% CO2.

Compliance Status: In compliance. The boilers are fired on gaseous fuels only and are

expected to emit less than 0.001% SO2 by volume and less than 0.02

grains PM/ft3 at 12% CO2.

SMAQMD Rule 411 - NOx from Boilers, Process Heaters and Steam Generators

SIP Approved: 08-01-2007 (72 FR 41894)

[10-27-2005 amended version]

Rule Description: This rule limits NOx and CO emissions from boilers, steam generator

and process heaters with heat input ratings of 1 MMBTU/hour or greater. It limits the emission concentration as described in the table

below.

Boiler Size (MMBTU/hr)	NOx ppmv at 3% O2	CO ppmv at 3% O2	or limit fuel usage therms/year
≥ 5 and < 20	15	400	200,000
≥ 20 and < 100	9	400	200,000
≥ 100	9	400	300,000

<u>Compliance Status:</u> The permittee complies with the rule requirements by either meeting the

emission standards or by limiting fuel usage, depending on the boiler.

Permit No. TV2009-09-01

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements

Section 6 - Boiler, Large (Heat Input ≥ 5 MMBTU/hr) (continued)

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: 12-05-1984 (49 FR 47490)

08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from the combustion

of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for

gaseous and liquid fuels and the expected sulfur content of the gaseous

and liquid fuels combusted in equipment at the facility.

Equipment	Fuel	SMAQMD Rule 420 Allowable Sulfur Content of Fuel	Expected Sulfur Content of Fuel Used(A)
Boiler	Propane	1.14 g/m3	0.33 g/m3
Boiler	Natural Gas	50 grains H2S/100ft3	<0.5 grains H2S/100ft3

⁽A) Commercial propane has a maximum sulfur concentration of 239 ppmv as H2S, thus the maximum concentration in grams/m3 as H2S is: g/m3 = [(239 ppmv)(12.187)(34.08 g/mol)/(273.15+25 °C)]/1000 = 0.33

40 CFR 63 Subpart DDDDD (begin at 63.7480) - NESHAP for Industrial, Commercial and Institutional Boilers:

Rule Description: This rule limits the amount of HAPs that may be released from all new

(built after 06-04-2010) and existing industrial, commercial and institutional boilers and process heaters that are located at facilities

considered to be major sources of HAP.

Rule Status: The rule was originally promulgated 09-13-2004 but immediately faced

legal challenges that delayed the rule. The following is the most recent

action on the rule.

02-21-2011 U.S. EPA finalized the revised rule.

05-18-2011 U.S. EPA published a notice delaying the effective date

of the boiler major source rule (The Boiler MACT) until the completion of the recently announced reconsideration or the completion of litigation on the rule,

whichever is earlier.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 6 - Boiler, Large (Heat Input ≥ 5 MMBTU/hr) (continued)

12-23-2011 U.S. EPA published the Boiler MACT reconsideration proposal (40 CFR 63, subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters).

01-09-2012 The U.S. District Court for the DC Circuit vacated the U.S. EPA's May 18, 2011 notice that delayed the effective dates of the Boiler MACT rule.

02-07-2012 U.S. EPA issued a No Action Assurance Letter to establish that they will exercise their enforcement discretion to not pursue enforcement action for violations of certain notification deadlines in the final Major Source Boiler rule. U.S. EPA intends to issue the final reconsideration rule prior to any of the compliance dates for existing sources.

The permittee only has existing boilers making the compliance date 3 years after the most recent promulgated rule which will be 02-21-2014.

At this time it is not known whether the reconsideration proposal, published 12-23-2011, will change the compliance dates.

Compliance Status:

The final requirements of the NESHAP reconsideration proposal are unknown. No requirements related to the NESHAP will be placed in the Title V permit at this time.

When the NESHAP reconsideration proposal becomes final the Title V permit will be reopened and the necessary requirements will be added.

Permit Conditions on SMAQMD Rule 201 Permits to Operate:

Rule Description:

The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permits that are not applicable federally enforceable requirements.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 6 - Boiler, Large (Heat Input ≥ 5 MMBTU/hr) (continued)

PO No.	Permit conditions that are not federally enforceable
21605 12369 12370	Conditions No. 1, and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
14064 14611 19744 19745 19751 20601 20602	Conditions No. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
20442 21605	Conditions No. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable. These boilers were originally permitted to allow natural gas or propane fuels (POs No. 10311 and 10325). This condition was accidentally removed when the permits were revised to comply with Rule 411 by installing Low-NOx burners. A condition allowing the use of propane as backup fuel will be added back to these permits.

Compliance Status:

The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

Permit No. TV2009-09-01

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 7 - Space Heaters

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: The space heaters are in compliance with the visible emission

requirement.

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)

12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion

contaminants by limiting emission concentrations of SO2 and particulate matter (PM). The rule's emission limits are 0.2% SO2 by volume and

0.1 grains PM/ft3 at 12% CO2.

Compliance Status: In compliance. The space heaters are fired on natural gas and are

expected to emit less than 0.001% SO2 by volume and less than 0.02

grains PM/ft3 at 12% CO2.

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: 12-05-1984 (49 FR 47490)

08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from the combustion

of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for

gaseous and liquid fuels and the expected sulfur content of the gaseous

and liquid fuels combusted in equipment at the facility.

Fuel	SMAQMD Rule 420 Allowable Sulfur Content of Fuel	Expected Sulfur Content of Fuel Used
Natural Gas	50 grains H2S/100ft3	<0.5 H2S/100ft3

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 7 - Space Heaters (continued)

Permit Conditions on SMAQMD Rule 201 Permits to Operate:

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are <u>not</u> federally enforceable
12127 13660	Conditions No. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

<u>Compliance Status:</u> The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

Equipment Specific Requirements

Section 8 - Rocket Motor Testing - Liquid Fuels

SMAQMD Rule 203 - Prevention of Significant Deterioration (40 CFR §52.21)

Rule Description: This rule requires compliance with the provisions of 40 CFR 52.21.

Compliance Status: The affected source, Test Stand E-5, has demonstrated compliance with

the requirements of this regulation.

SMAQMD Rule 401 - Ringelmann Chart

<u>SIP Approved:</u> 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: The rocket motor tests are never more than 3 minutes in duration and

they are never less than 1 hour apart. Therefore, the permittee

complies with this regulation.

Visible emissions from the associated oxidizer flares are less than 20%

opacity

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)

12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion

contaminants by limiting emission concentrations of SO2 and particulate matter (PM). The rule's emission limits are 0.2% SO2 by volume and

0.1 grains PM/ft3 at 12% CO2.

Compliance Status: This requirement was not intended for unconfined emissions. Particulate

emissions from the rocket motor testing are created right before the gases exit the rocket thus there is no stack for sampling. The high temperature and flow also make it impossible to verify compliance with this rule. Therefore, rocket motor testing shall be treated as a fugitive

source and as such, not subject to this rule.

Equipment Specific Requirements

Permit No. TV2009-09-01

Section 8 - Rocket Motor Testing - Liquid Fuels (continued)

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: 12-05-1984 (49 FR 47490)

08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from combustion of

fuels.

<u>Compliance Status:</u> Rocket motor fuels meet the requirements of this rule.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 63 Subpart PPPP National Emission Standards for Hazardous Air Pollutants: Engine Test Cells/Stands (begin at 63.9280)

<u>Promulgated</u>: 05-27-2003 (68 FR 28774)

Rule Description: This NESHAP establishes national emission standards for hazardous air

pollutants for engine test cells/stands located at major sources of

hazardous air pollutants (HAP) emissions.

Compliance Status: 40 CFR 63.9290(d)(2) exempts "any portion of the affected source used

exclusively for testing rocket engines" from all requirements of the

NESHAP

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are <u>not</u> federally enforceable
8534 12164	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit

conditions.

Equipment Specific Requirements

Section 9 - Rocket Motor Testing - Solid Fuels

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: The rocket motor tests are never more than 3 minutes in duration and

they are never less than 1 hour apart. Therefore, the permittee

complies with this regulation.

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 406 - Specific Contaminants

<u>SIP Approved:</u> 12-05-1984 (49 FR 47490)

12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion

contaminants by limiting emission concentrations of SO2 and particulate matter (PM). The rule's emission limits are 0.2% SO2 by volume and

0.1 grains PM/ft3 at 12% CO2.

Compliance Status: This requirement was not intended for unconfined emissions. Particulate

emissions from the rocket testing are created right before the gases exit the rocket thus there is no stack for sampling. The high temperature and flow also make it impossible to verify compliance with this rule. Therefore, rocket testing shall be treated as a fugitive source and as

such, not subject to this rule.

SMAQMD Rule 420 - Sulfur Content of Fuels

<u>SIP Approved</u>: 12-05-1984 (49 FR 47490)

08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from combustion of

fuels.

Compliance Status: Rocket motor fuels meet the requirements of this rule.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 9 - Rocket Motor Testing - Solid Fuels (continued)

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

<u>40 CFR 63 Subpart PPPPP National Emission Standards for Hazardous Air Pollutants:</u> Engine Test Cells/Stands (begin at 63.9280)

Promulgated: 05-27-2003 (68 FR 28774)

Rule Description: This NESHAP establishes national emission standards for hazardous air

pollutants for engine test cells/stands located at major sources of

hazardous air pollutants (HAP) emissions.

Compliance Status: 40 CFR 63.9290(d)(2) exempts "any portion of the affected source used

exclusively for testing rocket engines" from all requirements of the

NESHAP

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are <u>not</u> federally enforceable
66, 68	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
71	Condition No. 1 - This is an administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
18853 18859 20703	Condition Nos. 1, 2, 3 and 4 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit

conditions.

Equipment Specific Requirements

Section 10 - Rocket Motor Testing - Liquid and Solid Fuels

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: The rocket motor tests are never more than 3 minutes in duration and

they are never less than 1 hour apart. Therefore, the permittee

complies with this regulation.

Visible emissions from the associated oxidizer and fuel flares are less

than 20% opacity.

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)

12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion

contaminants by limiting emission concentrations of SO2 and particulate matter (PM). The rule's emission limits are 0.2% SO2 by volume and

0.1 grains PM/ft3 at 12% CO2.

Compliance Status: This requirement was not intended for unconfined emissions. Particulate

emissions from the rocket testing are created right before the gases exit the rocket thus there is no stack for sampling. The high temperature and flow also make it impossible to verify compliance with this rule. Therefore, rocket testing shall be treated as a fugitive source and as

such, not subject to this rule.

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: On 12/05/84 (49 FR 47490):

Rule Description: This rule regulates emissions of sulfur compounds from combustion of

fuels.

Compliance Status: Rocket motor fuels meet the requirements of this rule.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 10 - Rocket Motor Testing - Liquid and Solid Fuels (continued)

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 63 Subpart PPPP National Emission Standards for Hazardous Air Pollutants: Engine Test Cells/Stands (begin at 63.9280)

<u>Promulgated</u>: 05-27-2003 (68 FR 28774)

Rule Description: This NESHAP establishes national emission standards for hazardous air

pollutants for engine test cells/stands located at major sources of

hazardous air pollutants (HAP) emissions.

Compliance Status: 40 CFR 63.9290(d)(2) exempts "any portion of the affected source used

exclusively for testing rocket engines" from all requirements of the

NESHAP

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
8633 8641 9284 9328	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
21015 21132	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit

conditions.

Permit No. TV2009-09-01

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements Section 11 - Abrasive Blasting Unit

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: Each abrasive blasting unit is vented through a baghouse and is

therefore not expected to have any visible emissions. The units are inspected annually by SMAQMD staff and have been found to be in

compliance this regulation.

SMAQMD Rule 404 – Particulate Matter

<u>SIP Approved:</u> 07-01-1987 (52 FR 26148)

11-20-1984 rule version is SIP approved

Rule Description: This rule regulates emissions of particulate matter by establishing

emission concentration limits.

Compliance Status: These abrasive blasting units are vented through baghouses. Therefore,

particulate matter emissions should be well below 0.1 grains/dscf.

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are <u>not</u> federally enforceable
6385 6386 8732 8733	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.
8532	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 11 - Abrasive Blasting Unit (continued)

PO No.	Permit conditions that are not federally enforceable
9963	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
20917	Conditions No. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

<u>Compliance Status:</u> The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

Equipment Specific Requirements

Section 12 - Dry Material Grinding System

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: The RDX/HMX grinding system unit is vented through four baghouses

(two primary and two secondary). Therefore, no visible emissions are expected from this process. The units are inspected annually by SMAQMD staff and have been found to be in compliance with this

regulation.

The grinding station (Microatomizer, 2 DH Micropulverizer and Raymond Mill processes) is vented through baghouses, rotoclones and a water wash system. Therefore, no visible emissions are expected from this process. The units are inspected annually by SMAQMD staff

and have been found to be in compliance with this regulation.

SMAQMD Rule 404 – Particulate Matter

<u>SIP Approved:</u> 07-01-1987 (52 FR 26148)

11-20-1984 rule version is SIP approved

Rule Description: This rule regulates emissions of particulate matter by establishing

emission concentration limits.

Compliance Status: The RDX/HMX grinding system is vented through four baghouses (two

primary and two secondary). Therefore, particulate matter emissions

should be well below 0.1 grains per dscf.

The grinding station (Microatomizer, 2 DH Micropulverizer and Raymond Mill processes) is vented through baghouses, rotoclones, and a water wash system. Therefore, particulate matter emissions should be well

below 0.1 grains per dscf.

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 12 - Dry Material Grinding System (continued)

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are <u>not</u> federally enforceable
157 158 7608 1401 1402	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.
7104 17904	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

<u>Compliance Status:</u> The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

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Permit No. TV2009-09-01

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 13 - Rocket Motor Dissection Process

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: The rocket motor dissection process is inspected annually by SMAQMD

staff and has been found to be in compliance with this regulation.

SMAQMD Rule 403 – Fugitive Dust

SIP Approved: 12-05-1984 (49 FR 47490)

11-29-1983 rule version is SIP approved

Rule Description: This rule regulates operations which periodically may cause fugitive

dust emissions into the atmosphere.

Compliance Status: the permittee has taken reasonable precautions to prevent fugitive dust

from being airborne beyond the property line.

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 404 – Particulate Matter

SIP Approved: 07-01-1987 (52 FR 26148)

11-20-1984 rule version is SIP approved

Rule Description: This rule regulates emissions of particulate matter by establishing

emission concentration limits.

Compliance Status: Particulate emissions from the rocket motor dissection process are

unconfined. Therefore, the rocket motor dissecting process shall be

treated as a fugitive source and as such, not subject to this rule.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 13 - Rocket Motor Dissection Process (continued)

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
22029	Condition Nos. 1, 2, 3 and 5 - These are administrative or emission requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
22040	Condition Nos. 1, 2, 3 and 4 - These are administrative or emission requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

<u>Compliance Status:</u> The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

Permit No. TV2009-09-01

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 14 - Particulate Collection System - Dry

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: These baghouses are air pollution control equipment and are not

expected to have any visible emissions. The units are inspected annually by SMAQMD staff and have been found to be in compliance

with this regulation.

SMAQMD Rule 404 – Particulate Matter

<u>SIP Approved:</u> 07-01-1987 (52 FR 26148)

11-20-1984 rule version is SIP approved

Rule Description: This rule regulates emissions of particulate matter by establishing

emission concentration limits.

Compliance Status: Particulate matter emissions from the baghouses are well below 0.1

grains per dscf.

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are <u>not</u> federally enforceable
277 7455 7456 8588	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
15125 21653 21766 21973	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 14 - Particulate Collection System - Dry (continued)

PO No.	Permit conditions that are not federally enforceable
22170 22225 22438	Condition Nos. 1, 2, 3 and 5 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
22888	Condition Nos. 1, 2, 3 and 4 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

<u>Compliance Status:</u> The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

Equipment Specific Requirements

Section 15 - Particulate Collection System - Wet Scrubber

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: This scrubber is air pollution control equipment and is not expected to

have any visible emissions. This unit is inspected annually by SMAQMD staff and has been found to be in compliance with this

regulation.

SMAQMD Rule 404 – Particulate Matter

<u>SIP Approved:</u> 07-01-1987 (52 FR 26148)

11-20-1984 rule version is SIP approved

Rule Description: This rule regulates emissions of particulate matter by establishing

emission concentration limits.

Compliance Status: Particulate matter emissions from the scrubber are well below 0.1 grains

per dscf.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
165	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

Permit No. TV2009-09-01

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 16 - Aerospace Coating Operation (Subject to Aerospace NESHAP

GG)

SMAQMD Rule 401 - Ringelmann Chart

<u>SIP Approved:</u> 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: All coating operations are performed inside a paint spray booth

equipped with particulate controls (filters). Therefore, visible emissions from these units are negligible. These units are observed in operation annually by SMAQMD staff and have been found to be in compliance

with this regulation.

SMAQMD Rule 404 - Particulate Matter

<u>SIP Approved:</u> 07-01-1987 (52 FR 26148)

11-20-1984 rule version is SIP approved

Rule Description: This rule regulates emissions of particulate matter by establishing

emission concentration limits.

Compliance Status: These coating operations are performed inside paint spray booths

equipped with particulate filters. Therefore, particulate matter emissions

should be well below 0.1 grains per dscf.

SMAQMD Rule 456 - Aerospace Assembly and Component Coating Operations

SIP Approved: 11/09/98 (63 FR 60214)

09/05/96 rule version is SIP approved

Rule Description: This rule regulates emissions of VOCs from the application and use of

coatings to aerospace components.

Compliance Status: The permittee is in compliance with the requirements of this rule.

As allowed under the "Development of Applications and Permits for Outdated SIP Requirements" provisions of White Paper Number 2 (Lydia Wegman, U.S. EPA, 04-05-1996), the requirements of the most recent

version of SMAQMD Rule 456 (10-23-2008) will be enforced.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 16 - Coating Operation - Aerospace Coating Subject to Aerospace NESHAP GG (continued)

40 CFR 63 Subpart GG NESHAP for Aerospace Manufacturing and Rework Facilities (begin at 63.741)

Promulgated: 09-01-1996 (60 FR 45956)

Rule Description: This NESHAP establishes national emission standards for HAPs from

the manufacture or rework of commercial, civil or military aerospace

vehicles or components.

Compliance Status: The permittee is in compliance with the applicable requirements of this

regulation. This facility does not perform any coating with inorganic HAPs as described in 40 CFR 63.745(g) nor does it perform chemical

milling maskant operations as per 40 CFR 63.747.

A. Applicable Requirements

63.744(a) - The permittee is subject to these requirements. The permittee conducts spray gun cleaning operations in enclosed gun cleaners.

63.745 - Primers and topcoats used by this facility meet the HAP and VOC limits specified in this regulation, which are the same as under SMAQMD Rule 456. The application methods are also the same as under SMAQMD Rule 456. The permittee does not use coatings containing inorganic HAPs.

63.746 - The permittee depaints less than six completed aerospace vehicles in a calendar year. Therefore, this facility is not subject to this section.

63.747 - The permittee does not conduct any chemical milling maskant application operations and is therefore not subject to this section.

63.748 - This facility is subject to these requirements. HAP-containing waste is handled in a manner that minimizes spills.

63.749 - The permittee is subject to these requirements. The permittee has met the compliance dates specified by this regulation.

63.750 - The permittee is subject to these requirements. Compliance with this regulation has been determined in accordance with the test methods and procedures specified under this section.

NESHAP GG (continued)

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 16 - Coating Operation - Aerospace Coating Subject to Aerospace

for the reasons stated below:

63.751 - The permittee is subject to the monitoring requirements of Subsections (a) and (e). The remaining Subsections are not applicable

Subsection (b) - This facility does not use incinerators or carbon absorbers in their coating operations.

Subsection (c) - This facility does not use coatings containing inorganic HAPs.

Subsection (d) - This facility does not conduct depainting operations as described in 63.746.

Subsection (f) - This section is not applicable to the type of monitoring required (visual inspection).

63.752 - The permittee is subject to the recordkeeping requirements of Subsections (a), (b) and (c). The remaining Subsections are not applicable for the reasons stated below:

Subsection (d) - This facility does not use coatings containing inorganic HAPs.

Subsection (e) - This facility does not conduct depainting operations as described in 63.746.

Subsection (f) - This facility does not conduct any chemical milling maskant application operations.

63.753 - The permittee is subject to the reporting requirements of Subsections (a), (b) and (c). The remaining Subsections are not applicable for the reasons stated below:

Subsection (d) - This facility does not conduct depainting operations as described in 63.746.

Subsection (e) - This facility does not conduct any chemical milling maskant application operations.

B. Streamlining of Applicable Requirements

Both the NESHAP GG and SMAQMD Rule 456 regulate <u>disposal</u> of solvent-laden materials. The NESHAP requirement is more comprehensive than SMAQMD Rule 456 thus Rule 456 Section 304.1 will be subsumed by the 40 CFR 63.744(a)(1).

Both the NESHAP and SMAQMD Rule 456 regulate <u>storage</u> of VOC-containing material. The SMAQMD Rule 456 requirement is more comprehensive than the NESHAP thus 40 CFR 63.744(a)(2) will be subsumed by Rule 456 Section 304.2.

For simplification purposes, the reporting period will be changed to coincide with the Title-V reporting periods. The reports will be due July 31 for the Jan-June period and January 31 for the Jul-Dec period.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 16 - Coating Operation - Aerospace Coating Subject to Aerospace
NESHAP GG (continued)

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

PO No.	Permit conditions that are <u>not</u> federally enforceable
150 8444	The first two conditions on the PO are not numbered - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
17204 17205	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

Permit No. TV2009-09-01

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 17 - Aerospace Cleaning and Surface Preparation Operation (Subject to Aerospace NESHAP GG)

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: The solvent cleaning and surface preparation activities are not expected

to cause any visible emissions. These units are observed in operation annually by SMAQMD staff and have been found to be in compliance

with this rule.

SMAQMD Rule 456 - Aerospace Assembly and Component Coating Operations

SIP Approved: 11/09/98 (63 FR 60214)

09/05/96 rule version is SIP approved

Rule Description: This rule regulates emissions of VOCs from cleaning solvents and

surface preparation.

<u>Compliance Status:</u> The permittee is in compliance with the requirements of this rule.

As allowed under the "Development of Applications and Permits for Outdated SIP Requirements" provisions of White Paper Number 2 (Lydia Wegman, U.S. EPA, 04-05-1996), the requirements of the most recent

version of SMAQMD Rule 456 (10-23-2008) will be enforced.

40 CFR 63 Subpart GG NESHAP for Aerospace Manufacturing and Rework Facilities (begin at 63.741)

<u>Promulgated</u>: 09-01-1996 (60 FR 45956)

Rule Description: This NESHAP establishes national emission standards for HAPs from

the manufacture or rework of commercial, civil or military aerospace

vehicles or components.

Compliance Status: The permittee is in compliance with the applicable requirements of this

regulation.

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I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 17 - Aerospace Cleaning and Surface Preparation Operation (Subject to Aerospace NESHAP GG) (continued)

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description:	The condition	s of opera	ation on th	e SMAQMI	D Rule	201 Perm	it to
	Operate limit	emission	concentrat	ions, limit	mass	emissions,	and
	require recordl	keeping an	d reporting.				

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are <u>not</u> federally enforceable
17489	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

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I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 18 - Aerospace Cleaning and Surface Preparation (Not Subject to

Aerospace NESHAP GG)

SMAQMD Rule 401 - Ringelmann Chart

<u>SIP Approved:</u> 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: The solvent cleaning and surface preparation activities are not expected

to cause any visible emissions. These units are observed in operation annually by SMAQMD staff and have been found to be in compliance

with this rule.

SMAQMD Rule 456 - Aerospace Assembly and Component Coating Operations

SIP Approved: 11/09/98 (63 FR 60214)

09/05/96 rule version is SIP approved

Rule Description: This rule regulates emissions of VOCs from cleaning solvents and

surface preparation.

<u>Compliance Status:</u> The permittee is in compliance with the requirements of this rule.

As allowed under the "Development of Applications and Permits for Outdated SIP Requirements" provisions of White Paper Number 2 (Lydia Wegman, U.S. EPA, 04-05-1996), the requirements of the most recent

version of SMAQMD Rule 456 (10-23-2008) will be enforced.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 63 Subpart GG NESHAP for Aerospace Manufacturing and Rework Facilities (begin at 63.741)

Promulgated: 09-01-1996 (60 FR 45956)

Rule Description: This NESHAP establishes national emission standards for HAPs from

the manufacture or rework of commercial, civil or military aerospace

vehicles or components.

Compliance Status: 40 CFR 63.741(h) provides an exemption for activities associated with

Space Vehicles as follows.

(h) Regulated activities associated with space vehicles designed to

Sacramento Metropolitan Air Quality Management District

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 18 - Aerospace Cleaning and Surface Preparation (Not Subject to Aerospace NESHAP GG) (continued)

travel beyond the limit of the earth's atmosphere, including but not limited to satellites, space stations, and the Space Shuttle System (including orbiter, external tanks, and solid rocket boosters), are exempt from the requirements of this subpart, except for depainting operations found in §63.746.

Since this process only allows the solvent cleaning and surface preparation operation to be performed on Space Vehicles as defined in 40 CFR 63.742 (see Condition No. 4) the requirements of 40 CFR 63 Subpart GG are not applicable.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description:

The conditions of operation on the SMAQMD Rule 201 Permit to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
20419	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 19 - Aerospace Coating Operation (Not Subject to Aerospace

NESHAP GG)

SMAQMD Rule 401 - Ringelmann Chart

<u>SIP Approved:</u> 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: All coating operations are performed inside a paint spray booth

equipped with particulate controls (filters). Therefore, visible emissions from these units are negligible. These units are observed in operation annually by SMAQMD staff and have been found to be in compliance

with this rule.

SMAQMD Rule 404 – Particulate Matter

<u>SIP Approved:</u> 07-01-1987 (52 FR 26148)

11-20-1984 rule version is SIP approved

Rule Description: This rule regulates emissions of particulate matter by establishing

emission concentration limits.

Compliance Status: All coating operations are performed inside a paint spray booth equipped

with particulate controls (filters). Therefore, particulate matter emissions

should be well below 0.1 grains per dscf.

SMAQMD Rule 456 – Aerospace Assembly and Component Coating Operations

<u>SIP Approved:</u> 11/09/98 (63 FR 60214)

09/05/96 rule version is SIP approved

Rule Description: This rule regulates emissions of VOCs from the application and use of

coatings to aerospace components.

Compliance Status: The permittee is in compliance with the requirements of this rule.

As allowed under the "Development of Applications and Permits for Outdated SIP Requirements" provisions of White Paper Number 2 (Lydia Wegman, U.S. EPA, 04-05-1996), the requirements of the most recent

version of Rule 456 (07-23-1998) will be enforced.

For PO 21140 the spray nozzle sprays the interior of the missile chamber as the chamber moves from several inches from the open end

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 19 - Aerospace Coating Operation (Not Subject to Aerospace NESHAP GG) (continued)

to the closed end and back. Since the coating is only applied to the interior of the missile chamber, the transfer efficiency is expected to exceed 65%. Since this method of application is not one of the approved methods of operation listed in SMAQMD Rule 456 Sections 303.1-303.8, this method of application must be approved in writing by both the SMAQMD APCO and the U.S. Environmental Protection Agency pursuant to Section 303.9. U.S. EPA approval of this type of coating application method was given in a letter, dated October 13, 2004, from Andrew Steckel, U.S. EPA Region 9, to Dave Grose, SMAQMD Stationary Source Division Manager.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 63 Subpart GG NESHAP for Aerospace Manufacturing and Rework Facilities (begin at 63.741)

<u>Promulgated</u>: 09-01-1996 (60 FR 45956)

Rule Description: This NESHAP establishes national emission standards for HAPs from

the manufacture or rework of commercial, civil or military aerospace

vehicles or components.

Compliance Status: 40 CFR 63.741(h) provides an exemption for activities associated with

Space Vehicles as follows.

(h) Regulated activities associated with space vehicles designed to travel beyond the limit of the earth's atmosphere, including but not limited to satellites, space stations, and the Space Shuttle System (including orbiter, external tanks, and solid rocket boosters), are exempt from the requirements of this subpart, except for depainting operations found in §63.746.

Condition No. 7 on the Title V permit only allows:

- 1. the application of Specialty Coatings as defined in 40 CFR Part 63 Subpart GG Appendix A.
- 2. the application of coatings to Space Vehicles as defined in 40 CFR 63.742 (see Condition No. 4) the requirements of 40 CFR 63 Subpart GG are not applicable.

Therefore the requirements of 40 CFR 63 Subpart GG are not applicable.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 19 - Aerospace Coating Operation (Not Subject to Aerospace NESHAP GG) (continued)

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

PO No.	Permit conditions that are <u>not</u> federally enforceable
153 5811 7497 8217	The first two unnumbered conditions are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
20652	Condition Nos. 1, 2, 3 and 5 - These are administrative or emission requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
21140	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

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I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 20 - Coating Operation - Metal and Wood

SMAQMD Rule 401 - Ringelmann Chart

Permit No. TV2009-09-01

SIP Approved: 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: All coating operations are performed inside a paint spray booth

> equipped with particulate controls (filters). Therefore, visible emissions from this unit are well below 20% opacity. These units are observed in operation annually by SMAQMD staff and have been found to be in

compliance with this rule.

SMAQMD Rule 404 – Particulate Matter

07-01-1987 (52 FR 26148) SIP Approved:

11-20-1984 rule version is SIP approved

This rule regulates emissions of particulate matter by establishing Rule Description:

emission concentration limits.

Compliance Status: The coating operations are performed inside a paint spray booth

equipped with particulate controls (filters). Therefore, particulate matter

emissions should be well below 0.1 grains per dscf.

SMAQMD Rule 451 – Surface Coating of Miscellaneous Metal Parts and Products

SIP Approved: 11-13-1998 (63 FR 63410)

> 12-05-1996 rule version is SIP approved 10-28-2010 rule version is the current version

Rule Description: This rule regulates emissions of VOCs from the application of coatings

to metal products.

Compliance Status: Coating operations performed under PO 7801 are subject to this rule

when metal parts are coated. The permittee will comply with all

applicable sections of this rule.

As allowed under the "Development of Applications and Permits for Outdated SIP Requirements" provisions of White Paper Number 2 (Lydia Wegman, U.S. EPA, 04-05-1996), the requirements of the most recent

version of SMAQMD Rule 451 (10-28-2010) will be enforced.

Permit No. TV2009-09-01

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 20 - Coating Operation - Metal and Wood (continued)

SMAQMD Rule 463 – Wood Products Coatings

SIP Approved: 04-09-2010 (75 FR 18068)

09-25-2008 rule version is SIP approved

Rule Description: This rule regulates emissions of VOCs from the application and use of

coatings to wood products.

Compliance Status: Coating operations performed under PO 7801 are subject to this rule

when wood products are coated. The permittee will comply with all

applicable sections of this rule.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 63 Subpart MMMM NESHAP for Surface Coating of Miscellaneous Metal Parts and Products (begin at 63.3880)

Promulgated: 01-02-2004 (69 FR 157)

Rule Description: This NESHAP establishes national emission standards for HAPs from

the coating of miscellaneous metal parts and products.

Compliance Status: PO 7801 is not subject to this regulation because the amount of coatings

used falls within the exemption level specified in 40 CFR 63.3881(b).

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permit to

Operate limit coating and cleanup materials VOC content, limit coating

application methods and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

PO No.	Permit conditions that are <u>not</u> federally enforceable
7801	The first two unnumbered conditions are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.

Permit No. TV2009-09-01

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements Section 21 - RDX Drying Facility

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

<u>Compliance Status:</u> The RDX drying operations are vented through condensers. Therefore,

visible emissions from these units are negligible. These units are observed in operation annually by SMAQMD staff and have been found

to be in compliance with this rule.

SMAQMD Rule 441 – Organic Solvents

<u>SIP Approved:</u> 01-24-1985 (50 FR 3338)

11-29-1983 rule version is SIP approved

Rule Description: This rule limits emissions of volatile organic compounds into the

atmosphere that may result from the use of organic solvents

Compliance Status: The VOCs emitted from the RDX drying facilities are not photochemically

reactive and are dried at 140 deg F temperature. Therefore, the applicable limit pursuant to this rule is 2,970 pounds of organic materials per day. The facility complies with this limit by complying with its local

permit to operate which limits VOC emissions to 150 lb/day.

Therefore, the requirements of this rule will be streamlined and subsumed

under the local permits to operate.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

PO No.	Permit conditions that are <u>not</u> federally enforceable
7780	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 22 - Degreaser, Non-vapor

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 454 – Degreasing Operations

SIP Approved: 04-09-2010 (75 FR 18068)

09-25-2008 rule version is SIP approved

Rule Description: This rule limits emissions of volatile organic compounds into the

atmosphere that may result from the use of VOC containing solvents in

degreasers.

Compliance Status: SMAQMD Rule 454 Section 110.3 provides the following exemption -

Effective September 25, 2009, the provisions of this rule shall not apply to degreasers which use solvents that contain 25 grams per liter or less VOCs including water and exempt compounds, as determined by Sections 502.5 and 502.6.

Condition No. 2 of the Title V permit requires the use of degreasing solvents with a VOC content not exceeding 25 grams/liter. Therefore, operation of the degreaser meets the exemption requirements of Section 110.3 and is not subject to the requirements of this rule.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

PO No.	Permit conditions that are not federally enforceable
6968 7075	The two unnumbered conditions are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements

Section 23 - Bowl Cleaning Station

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 441 – Organic Solvents

SIP Approved: 01-24-1985 (50 FR 3338)

11-29-1983 rule version is SIP approved

Rule Description: This rule limits emissions of volatile organic compounds into the

atmosphere that may result from the use of organic solvents

Compliance Status: This operation is not subject to this rule because it is subject to Rule 456

Aerospace Assembly and Component Coating Operations. Section 102 of Rule 456 states that the requirements of Rule 441 shall not apply to

operations subject to Rule 456.

SMAQMD Rule 454 – Degreasing Operations

SIP Approved: 04-09-2010 (75 FR 18068)

09-25-2008 rule version is SIP approved

Rule Description: This rule limits emissions of volatile organic compounds into the

atmosphere that may result from the use of organic solvents

Compliance Status: SMAQMD Rule 454 Section 110.7 provides the following exemption -

The VOC content limits in Sections 302.2 and 302.3 do not apply to degreasing of tools, equipment and machinery, regulated under Rule 456, AEROSPACE ASSEMBLY AND COMPONENT COATING OPERATIONS, and aerospace products using solvents that comply with the surface preparation and cleanup VOC limits in Section 304.7 of Rule 456, AEROSPACE ASSEMBLY AND COMPONENT

COATING OPERATIONS.

The bowl cleaning operation is not exempt from the other requirements of this rule such as record keeping. This rule requires monthly records of solvents used. Since the NESHAP 40 CFR 63 Subpart GG requires annual usage records, the permit will require both monthly and annual records.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 23 - Bowl Cleaning Station (continued)

SMAQMD Rule 456 – Aerospace Assembly and Component Coating Operations

SIP Approved: 11/09/98 (63 FR 60214)

09/05/96 rule version is SIP approved

Rule Description: This rule regulates emissions of VOCs from cleaning solvents and

surface preparation associated with aerospace coating operations.

<u>Compliance Status:</u> The permittee is in compliance with the requirements of this rule.

This operation is subject to this rule because it is a "cleaning" of "tooling" operation as defined by Sections 209 and 255 of this rule, respectively. The permittee is in compliance with all applicable requirements of this

rule.

40 CFR 63 Subpart GG NESHAP for Aerospace Manufacturing and Rework Facilities (begin at 63.741)

Promulgated: 09-01-1996 (60 FR 45956)

Rule Description: This NESHAP establishes national emission standards for HAPs from

the manufacture or rework of commercial, civil or military aerospace

vehicles or components.

Compliance Status: The permittee is in compliance with the material cleaning, handling and

waste disposal requirements of the regulation.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

PO No.	Permit conditions that are <u>not</u> federally enforceable
	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 24 - Gasoline Storage and Dispensing Facility

SMAQMD Rule 448 - Gasoline Transfer Into Stationary Storage Containers

SIP Approved: 01-23-1996 (61 FR 1716)

02-02-1995 rule version is SIP approved 02-26-2009 is the current rule version

Rule Description: This rule limits emissions resulting from the transfer of gasoline into any

stationary storage container or delivery vessel, or from the pump-out of gasoline from any stationary storage container, delivery vessel, or

vehicle fuel tank.

Compliance Status: The gasoline dispensing facility is in compliance with all the applicable

requirements of this rule

As allowed under the "Development of Applications and Permits for Outdated SIP Requirements" provisions of White Paper Number 2 (Lydia Wegman, U.S. EPA, 04-05-1996), the requirements of the most recent

version of SMAQMD Rule 448 (02-26-2009) will be enforced.

SMAQMD Rule 449 – Transfer of Gasoline into Vehicle Fuel Tanks

<u>SIP Approved:</u> 03-24-2003 (68 FR 14156)

09-26-2002 rule version is SIP approved 02-26-2009 is the current rule version

Rule Description: This rule limits the emissions of gasoline vapors into the atmosphere

when motor vehicle fuel tanks are filled.

Compliance Status: The gasoline dispensing facility is in compliance with all the applicable

requirements of this rule.

As allowed under the "Development of Applications and Permits for Outdated SIP Requirements" provisions of White Paper Number 2 (Lydia Wegman, U.S. EPA, 04-05-1996), the requirements of the most recent

version of SMAQMD Rule 448 (02-26-2009) will be enforced.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions and require

recordkeeping and reporting.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Section 24 - Gasoline Storage and Dispensing Facility (continued)

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are <u>not</u> federally enforceable
17375	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 25 - Pilot Plant Chemical Manufacturing Process

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: The visible emissions from this process are negligible. This process

has been observed in operation annually by SMAQMD staff and has

been found to be in compliance with this rule.

SMAQMD Rule 441 - Organic Solvents

SIP Approved: 01-24-1985 (50 FR 3338)

11-29-1983 rule version is SIP approved

Rule Description: This rule limits emissions of volatile organic compounds into the

atmosphere that may result from the use of organic solvents

Compliance Status: The chemical manufacturing process has a VOC emission limit of 38

pounds per quarter, which is well below the emission limits established in

this rule.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

PO No.	Permit conditions that are <u>not</u> federally enforceable
20492	Condition Nos. 1, 2, 3 and 7 - These are administrative and emission requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 26 - Soluble Mandrel Manufacturing Process

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)

04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere

through visible emissions and opacity limitations.

Compliance Status: The visible emissions from this process are negligible. This process

has been observed in operation annually by SMAQMD staff and has

been found to be in compliance with this rule.

SMAQMD Rule 441 – Organic Solvents

SIP Approved: 01-24-1985 (50 FR 3338)

11-29-1983 rule version is SIP approved

Rule Description: This rule limits emissions of volatile organic compounds into the

atmosphere that may result from the use of organic solvents

Compliance Status: The soluble mandrel manufacturing process has a VOC emission limit of

42 pounds per quarter, which is well below the emission limits

established in this rule.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to

Operate limit emission concentrations, limit mass emissions, and

require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201

PO No.	Permit conditions that are not federally enforceable
21734	Conditions No. 1, 2, 3 and 5 - These are administrative and emission requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Permit condition consistency for California ATCM for Stationary IC Engines

<u>California Air Toxics Control Measure for Stationary Compression Ignition Engines (CCR, Title 17, Section 93115):</u>

The following SMAQMD Rule 201 Permits to Operate for diesel fueled IC engines include the requirements of this ATCM. This ATCM is not federally enforceable. However, the Title V permit will include these ATCM requirements also, thus making them federally enforceable. This will simplify compliance by bringing consistency between the operating conditions on the SMAQMD Rule 201 permit and the Title V permit.

Equipment		PO No.			
IC Engine, fueled	diesel	10294 10408 10421 10422 10423 10426	10434 10435 10436 10437 10438 10439	10440 10441 10442 10443 10444	10445 10446 10779 14748 15335

Compliance Status: The permittee is in compliance with these requirements.

J. TITLE V PERMIT RECOMMENDATION

It is recommended that the Aerojet - Sacramento Operations Title V Federal Operating permit be renewed.

See proposed Title V Federal Operating Permit No. TV2009-09-01 for permit conditions.

Approved by: Jorge DeGuzman Date: March 26, 2013

ATTACHMENT A

SMAQMD RULES THAT ARE "APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS" FOR AEROJET - SACRAMENTO OPERATIONS

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
•	•	101	General Provisions and Definitions 09-03-1998 version	Yes - no related conditions are included in the permit because of general nature of the rule.
•	•	102	Circumvention 11-29-1983 version	Yes - no related conditions are included in the permit because of general nature of the rule.
	•	103	Exceptions 11-29-1983 version	No - source does not operate the type of equipment described in this rule.
	•	104	General Conformity 11-03-1994 version	No - the rule's purpose is to have the SMAQMD review federal conformity findings.
•	•	105	Emission Statement 04-20-1993 version	Yes - related conditions are included in the permit.
		107	Alternative Compliance	No - it is not a SIP approved rule.
•		108	Minor Violations	No - it is not a SIP approved rule.
•	•	201	General Permit Requirements 11-20-1984 version	Yes - no related conditions are included in the permit because of the general nature of the rule.
•	•	202	New Source Review 10-28-2010 version	Yes - related conditions are included in the permit.
		203	Prevention of Significant Deterioration	No - it is not a SIP approved rule.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
		204	Emission Reduction Credits	No - it is not a SIP approved rule.
		205	Community Bank and Priority Reserve Bank	No - it is not a SIP approved rule.
		206	Mobile and Transportation Source Emission Reduction Credits	No - it is not a SIP approved rule.
•	*	207	Title V Federal Operating Permit Program	Yes - related conditions are included in the permit. (★Although this is not a SIP approved rule it is applicable because it is part of the approved SMAQMD Title V Permit Program.)
		208	Acid Rain	No - it is not a SIP approved rule.
		209	Limiting Potential to Emit	No - it is not a SIP approved rule.
		210	Synthetic Minor Source Status	No - it is not a SIP approved rule.
•		211	MACT at Major Sources of Hazardous Air Pollutants	No - it is not a SIP approved rule, but the requirements of this rule are also contained in the CAA. As per EPA guidance, the MACT requirements for boilers will become applicable after the rule is finalized.
•		213	Federal Major Modifications	No - it is not a SIP approved rule but the requirements within it are part of EPA's NSR reform and thus federally applicable

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
•	•	214	Federal New Source Review	Yes - related conditions are included in the permit.
		215	Agricultural Permit Requirements and New Agricultural Permit Review	No - it is not a SIP approved rule.
•	*	301	Stationary Source Permit Fees	Yes - related conditions are included in the permit. (★Although this is not a SIP approved rule it is applicable because it is part of the approved SMAQMD Title V Permit Program.)
•		302	Hearing Board Fees	No - it is not a SIP approved rule.
		303	Agricultural Burning Permit Fees	No - it is not a SIP approved rule.
•		304	Plan Fees	No - it is not a SIP approved rule.
•		305	Environmental Document Preparation and Processing Fees	No - it is not a SIP approved rule.
•		306	Air Toxics Fees	No - it is not a SIP approved rule.
•	•	307	Clean Air Act Fees 09-26-2002 version	Yes - related conditions are included in the permit.
		310	Permit Fees - Agricultural Source	No - it is not a SIP approved rule

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
•	•	401	Ringelmann Chart 04-05-1983 version	Yes - related conditions are included in the permit.
•		402	Nuisance	No - it is not a SIP approved rule.
•	•	403	Fugitive Dust 11-29-1983 version	Yes - related conditions are included in the permit.
•	•	404	Particulate Matter 11-20-1984 version	Yes - related conditions are included in the permit. (see discussion of streamlining applicable requirements and permit shield)
•	•	405	Dust and Condensed Fumes 11-29-1983 version	No - the source does not operate such a process.
•	•	406	Specific Contaminants 11-29-1983 version	Yes - related conditions are included in the permit. (see discussion of streamlining applicable requirements and permit shield)
•	•	407	Open Burning 11-29-1983 version	Yes - no related conditions are included in the permit because the source does not conduct open burning.
	•	408	Incinerator Burning 11-29-1983 version	No - the source does not operate an incinerator.

Rule is Applicable	Rule is SIP Approved	Rule No.		Is the Rule an "Applicable Federally Enforceable
Ru	Ru Ap	Ru	Rule Title	Requirement"?
	•	409	Orchard Heaters 11-29-1983 version	No - the source does not operate orchard heaters.
	•	410	Reduction of Animal Matter 11-29-1983 version	No - the source does not operate equipment for the reduction of animal matter.
•	•	411	Boiler NOx 08-23-2007 version	Yes - related conditions are included in the permit.
•	•	412	Stationary IC Engines at Major Stationary Sources of NOx 06-01-1995 version	Yes - related conditions are included in the permit.
	•	413	Stationary Gas Turbines 03-24-2005 version	No - This source does not operate turbines.
•	•	414	Natural Gas Fired Water Heaters 08-01-1996 version	Yes - The permit does not contain any related conditions because the rule targets the sale of water heaters, not the operation of water heaters.
		417	Wood Burning Appliances	No - it is not a SIP approved rule.
•	•	420	Sulfur Content of Fuels 11-29-1983 version	Yes - related conditions are included in the permit. (see discussion of streamlining applicable requirements and permit shield)

Rule is Applicable	Rule is SIP Approved	Rule No.		
Rule is	Rule is 3 Approve	Rule	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
•	•	441	Organic Solvents 11-29-1983 version	Yes - no related conditions are included in the permit because of limited applicability.
•	•	442	Architectural Coatings 09-05-1996 version	Yes - related conditions are included in the permit.
	•	443	Leaks from Synthetic Organic Chemical and Polymer Manufacturing 09-05-1996 version	No - the source does not operate synthetic organic chemical or polymer manufacturing equipment.
	•	444	Petroleum Solvent Dry Cleaning 08-13-1981 version	No - the source does not operate petroleum solvent dry cleaning equipment.
	•	446	Storage of Petroleum Products 11-16-1993 version	No - the source does not store affected petroleum products.
	•	447	Organic Liquid Loading 04-02-1998 version	No - the source does not operate organic liquid loading equipment.
•	•	448	Gasoline Transfer into Stationary Storage Containers 02-02-1995 version	Yes - related conditions are included in the permit.
•	•	449	Transfer of Gasoline into Vehicle Fuel Tanks 09-26-2002 version	Yes - related conditions are included in the permit.

Rule is Applicable	Rule is SIP Approved	Rule No.		Is the Bule on "Applicable Federally Enforceable
Ruk	Rul	Rul	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
	•	450	Graphic Arts Operations 12-05-1996 version	No - the source does not operate a graphic arts process as defined in the rule.
•	•	451	Surface Coating of Miscellaneous Metal Parts and Products 11-29-1983 version	Yes - related conditions are included in the permit.
	•	452	Can Coating 09-05-1996 version	No - the source does not operate a can coating process.
	•	453	Cutback and Emulsified Asphalt Paving Materials 11-29-1983 version	No - the source does not manufacture or apply cutback or emulsified asphalt paving materials.
•	•	454	Degreasing Operations 04-03-1997 version	Yes - related conditions are included in the permit.
	•	455	Pharmaceuticals Manufacturing 11-29-1983 version	No - the source does not manufacture pharmaceuticals.
•	•	456	Aerospace Coating Operations 10-23-2008 version	Yes - related conditions are included in the permit.
		457	Methanol Compatible Tanks	No - it is not a SIP approved rule.

Rule is Applicable	Rule is SIP Approved	Š.		
Rule is Applica	Rule Appr	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
	•	458	Large Commercial Bread Bakeries 09-05-1996 version	No - the source does not produce bread products.
	•	459	Automotive, Truck and Heavy Equipment Refinishing Operations 10-02-1997 version	No - the source does not refinish vehicles.
•		460	Adhesives and Sealants	No - it is not a SIP approved rule.
•		463	Wood Products Coatings	No - it is not a SIP approved rule.
	•	464	Organic Chemical Manufacturing Operations 07-23-1998 version	No - the source does not manufacture organic chemicals.
		465	Polyester Resin Operations	No - it is not a SIP approved rule.
•	•	466	Solvent Cleaning 05-23-2002 version	Yes - related conditions are included in the permit.
		485	Municipal Landfill Gas	No - it is not a SIP approved rule.
		496	Large Confined Animal Facilities	No - it is not a SIP approved rule.
	•	501	Agricultural Burning 11-29-1983 version	No - the source does not conduct agricultural burning.

Rule is Applicable	Rule is SIP Approved	Rule No.		Is the	e Rule an "Applicable Federally Enforceable
A A	A A	Ru	Rule Title	Requ	uirement"?
•		601	Procedure before the Hearing Board	No -	it is not a SIP approved rule.
•		602	Breakdown Conditions: Emergency Variance	No -	it is not a SIP approved rule.
•	•	701	Emergency Episode Plan 05-27-1999 version	Yes	- but actual facility emissions are below the applicability levels in the rule.
•		801	New Source Performance Standards	No -	it is not a SIP approved rule. Note: there are equivalent federal regulations.
•		901	General Requirements	No -	it is not a SIP approved rule. Note: there are equivalent federal regulations.
•		902	Asbestos	No -	it is not a SIP approved rule. Note: there is an equivalent federal regulation.
•		903	Mercury	No -	it is not a SIP approved rule. Note: there is an equivalent federal regulation.
•		904	Airborne Toxic Control Measures	No -	it is not a SIP approved rule. Note: there are equivalent federal regulations for some of the listed ATCMs.
		1002	Fleet Inventory	No -	it is not a SIP approved rule.

Rule is Applicable	Rule is SIF Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
		1003	Reduced-Emission Fleet Vehicles/Alternative Fuels	No - it is not a SIP approved rule.
		1005	Mobile Source Emission Reduction Credits/Banking	No - it is not a SIP approved rule.
		1006	Transportation Conformity	No - it is not a SIP approved rule.